

Date: 21/11/2025

Section 62A Applications
Team The Planning
Inspectorate
3rd Floor
Temple Quay
House 2 The
Square Temple
Quay
Bristol
BS1 6PN

Sent via e-mail

Dear Sir/Madam,

Town and Country Planning Act 1990

76a Savoy rd, Bristol, BS4 3SY

Erection of a first floor rear extension, ground floor rear extension and internal alterations to facilitate the change of use of the property from a 5-bedroom House in Multiple Occupation (C4) to a 8-bedroom House in Multiple Occupation (HMO) (Use Class Sui Generis)

I am writing for myself, Habibo Homes Ltd, to apply for the provision of 3 extra bedrooms within an existing dwellinghouse in multiple occupation (C4). External alterations are proposed in the form of a 24.05sqm extension to accommodate the communal area. This includes the sqm taken up by the walls as well. I have chosen to take the Section 62A route and submit the proposal directly to the Planning Inspectorate. Notice of this intention was given on the 21st October 2025.

I can confirm that the development would not be liable for CIL. I attach the following documents as part of this application:

- Application forms and certificates;
- Drawing no. 1 - SITE LOCATION - A001;
- Drawing no. 2 - EXISTING BLOCK PLAN A002;
- Drawing no. 3 - PROPOSED BLOCK PLAN - A003;
- Drawing no. 4 - EXISTING GROUND FLOOR LAYOUT - A004;
- Drawing no. 5 - EXISTING FIRST FLOOR LAYOUT - A005;
- Drawing no. 6 - EXISTING SECOND FLOOR LAYOUT - A006;

- Drawing no. 7 - EXISTING FRONT ELEVATION - A007;
- Drawing no. 8 - EXISTING REAR ELEVATION - A008;
- Drawing no. 9 - EXISTING A-A ELEVATION - A009;
- Drawing no. 10 - EXISTING B-B ELEVATION - A010;
- Drawing no. 11 - PROPOSED GROUND FLOOR LAYOUT - A011;
- Drawing no. 12 - PROPOSED FIRST FLOOR LAYOUT - A012;
- Drawing no. 13 - PROPOSED SECOND FLOOR LAYOUT - A013;
- Drawing no. 14 - PROPOSED FRONT ELEVATION - A014;
- Drawing no. 15 - PROPOSED REAR ELEVATION WITH NEIGHBOUR - A015;
- Drawing no. 16 - PROPOSED A-A ELEVATION - A016;
- Drawing no. 17 - PROPOSED B-B ELEVATION WITH NEIGHBOUR - A017;
- Drawing no. 18 - PROPOSED GROUND FLOOR LAYOUT WITH NEIGHBOUR - A018;
- Drawing no. 19 - PROPOSED FIRST FLOOR LAYOUT WITH NEIGHBOUR - A019;
- Drawing no. 20 - PROPOSED SECOND FLOOR LAYOUT WITH NEIGHBOUR A020;
- Drawing no. 21 - PROPOSED BIKE STORE - A021;
- Drawing no. 22 - PROPOSED BIN STORE A - A022;
- Drawing no. 23 - PROPOSED BIN STORE B - A023;
- BCC BNG Screening Assessment - BNG Exemption Statement

Site and planning history

The site comprises an 5-bed, dwellinghouse in multiple occupation, established under permitted development. The site was previously granted permission for a new build 4 bedroom house in November 2020 with ref: 20/03671/F.

I propose to build a ground floor rear extension to accommodate a new communal dining room, create a bedroom in the existing communal area, build a first floor extension to accommodate a bedroom & make internal alterations to create another bedroom. No other alterations are proposed. It is proposed to provide 4no. Sheffield Stands within a new bike store in the rear garden. The additional bedrooms are proposed as a single-occupancy bedroom and would measure 9.0sqm, 8.1sqm & 9.3sqm exceeding the minimum 6.51sqm requirement for a single HMO bedroom.

The proposed HMO would include a 24.1sqm kitchen/lounge/diner, which exceeds the 24sqm licensing requirement for a 8-bed HMO. There will be 5 bathrooms in the proposed development, also exceeding the licensing requirements.

Refuse and recycling is proposed to be provided within the dedicated stores in the front garden, secure and covered cycle storage for 8 bicycles would be provided within the rear garden.

Planning analysis

Policies the Proposal Complies With:

Core Strategy Policies

- **BCS1 – Climate Change & Sustainability**
Sustainable location with reduced car dependence; cycle storage supports low-carbon travel.
 - **BCS13 – Climate Change**
Supports development that reduces reliance on private cars and encourages sustainable transport.
 - **BCS14 – Sustainable Energy**
Efficient layout and reduced parking encourage lower carbon lifestyles.
 - **BCS15 – Sustainable Design & Construction**
Efficient use of existing building stock; high-quality internal environment.
 - **BCS18 – Housing Type & Mix**
Provides needed shared accommodation and contributes to the diversity of Bristol's housing supply.
 - **BCS20 – Effective Use of Land**
Makes efficient use of an existing residential plot through intensification.
 - **BCS21 – Quality Urban Design**
High-quality design, subservient first-floor extension, coherent building line, and protection of neighbour amenity.
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Site Allocations & Development Management Policies

- **DM2 – Residential Amenity**
Adequate internal space, increased usable garden space, improved outlook, and no unacceptable loss of light or privacy to neighbours.
- **DM14 – Local Character & Distinctiveness**
Extensions designed to respect local form, using matching materials and appropriate massing.
- **DM15 – Extensions to Dwellings**
Scale, height and depth are compatible with the established form; complies with 25° daylight test and avoids harmful dominance.
- **DM23 – Transport Development Management**
Sustainable location; removal of parking space justified through improved amenity and provision of secure cycle storage.
- **DM29 – Design of New Buildings**
New built elements are proportionate, coherent and high-quality.
- **DM30 – Alterations to Existing Buildings**
First-floor extension is subservient, matches neighbouring projection, and creates a balanced rear elevation.
- **DM32 – Houses in Multiple Occupation (HMOs)**
Complies with criteria on concentration, amenity, design, facilities, and residential environment.

Supports change of use from C4 to Sui Generis.

Supplementary Planning Documents (SPD)

- **SPD2 – Residential Amenity**
 - ✓ 25° daylight test passed
 - ✓ Falling garden levels reduce perceived mass
 - ✓ Outbuilding at 74a already limits outlook
 - ✓ Improved outlook for 76a by aligning building line
 - ✓ Sufficient private amenity space
 - ✓ No unacceptable overbearing or overshadowing
- **Bristol HMO SPD / Informal Guidance**

Supports well-designed, well-managed HMOs with adequate facilities, cycle storage, and good-quality amenity provision.

Housing mix

Policy BCS18 supports a neighbourhood with a mix of housing tenure, types and sizes to meet the changing needs and aspirations of its residents. The supporting text states that evidence provided in the Strategic Housing Market Assessment (SHMA) suggests that new developments should provide for more accommodation for smaller households. The SHMA was updated in February 2019 for the wider Bristol area. This states that single person households are expected to represent 40% of the overall household growth: an increase of 34,000 from 2016 to 2036. The proportion of single person households is therefore predicted to increase from 31.7% to 33.3%, whilst households with children are predicted to remain constant, at 26.2%. 'Other households' (which would include shared accommodation) are predicted to increase from 8.3% to 9.8%.

The 2019 SHMA states that, *"whilst there is projected to be an increase of 34,000 extra single person households, only 14,600 extra dwellings have one bedroom (5,000 market homes and 9,600 affordable homes). This reflects that many single person households will continue to occupy family housing in which they already live."* (para 2.20). It therefore follows that the provision of accommodation for single households (which HMO rooms provide) would potentially free up family housing, in addition to meeting an identified need. The SHMA predicts that the need for 1- bed accommodation will increase by 16.8% over the period, whilst the need for 3-bed houses will increase by a broadly similar figure (17.6%).

Further to the 2019 SHMA, the LPA has recently published the 'City of Bristol Local Housing Needs Assessment Report of Findings' (November 2023), as a background paper to the new Local Plan. This predicts that, for the period 2020-2040, single person households will represent almost a third of the overall household growth (15,000, 32%), couples without dependent children will represent almost a further third of the growth (13,600, 29%), whilst families with dependent children will make up approximately one fifth of the overall household growth (9,000, 19%). Pertinent to the application, the

need for HMO and student households (9,400, 20%) exceeds that for families with children.

At the start of the 2022/23 academic year, UWE had 485 students on the accommodation waiting list, whilst 137 UWE students were residing at accommodation in Newport, with other students having to commute from Gloucester and Bath (Source: BBC News website). For 2023/24, in addition to the Newport accommodation, UWE was also offering 86 rooms at Shaftesbury Hall in Cheltenham, and 63 rooms at Upper Quay House, Gloucester, indicative of the shortage of

shared accommodation in the city. In December 2022, *The Guardian*¹ reported a 25% under-provision of student accommodation within the Bristol area. More recent research² suggests that there will be a nationwide shortage of some 600,000 student bedspaces by 2026; the same report notes that, in Bristol, bed demand has increased by 15,058 during the period 2017-2023, while the number of beds has only increased by 3,511.

In terms of rental property more broadly, Bristol City Council has publicly acknowledged that the city has a “rent crisis”³, with over one-third of the population (134,000 people) currently renting privately in Bristol. As the Council itself notes, *“Over the last decade, private rents in Bristol have increased by 52%, while wages have only risen by 24%. On average, Bristol residents now need almost nine times their annual salary to buy a house. The spiralling costs mean housing is becoming increasingly unaffordable, pushing many further away from their place of work, family, and support networks.”*

There is no doubt that a shortage of supply of rental accommodation in the city has had an impact on rental costs. A recent (October 2023) report by Unipol and HEPI⁴ shows that average rental costs in Bristol, at £9,200 per room for the 2023/24 period, are the highest outside London, and have increased by 9% from 2021/22. It is not outlandish to suggest that the Council’s adoption of Article 4 Directions, removing Part 3, Class L Permitted Development, to create small houses in multiple accommodation, introduced to limit the spread of HMOs, has also contributed to rising rents, for both young people in employment and students. Restricting supply will naturally increase demand.

The Bristol City Council ‘JSNA Health and Wellbeing Profile 2023/24’ reported a doubling in the number of households in temporary accommodation from 2019/20 Q3 (573) to 2020/21 Q4 (1124). Whilst numbers dropped back to 868 in the first quarter of 2021/22, they have increased in every quarter since then, with the latest figures (2022/23 Q3) showing 1178 households in temporary accommodation. The report states, *“Temporary Accommodation is a key indicator of homelessness and poor housing supply. The number of households placed in temporary accommodation in Bristol has doubled since 2020 and without the availability of affordable move-on accommodation there are no signs of it returning to pre-pandemic levels.”*

¹ [UK student housing reaching ‘crisis point’ as bad as 1970s, charity warns | Student housing | The Guardian](#)

² [Students left in ‘nightmare’ accommodation as UK cities short of 620,000 beds by 2026 \(inews.co.uk\)](#)

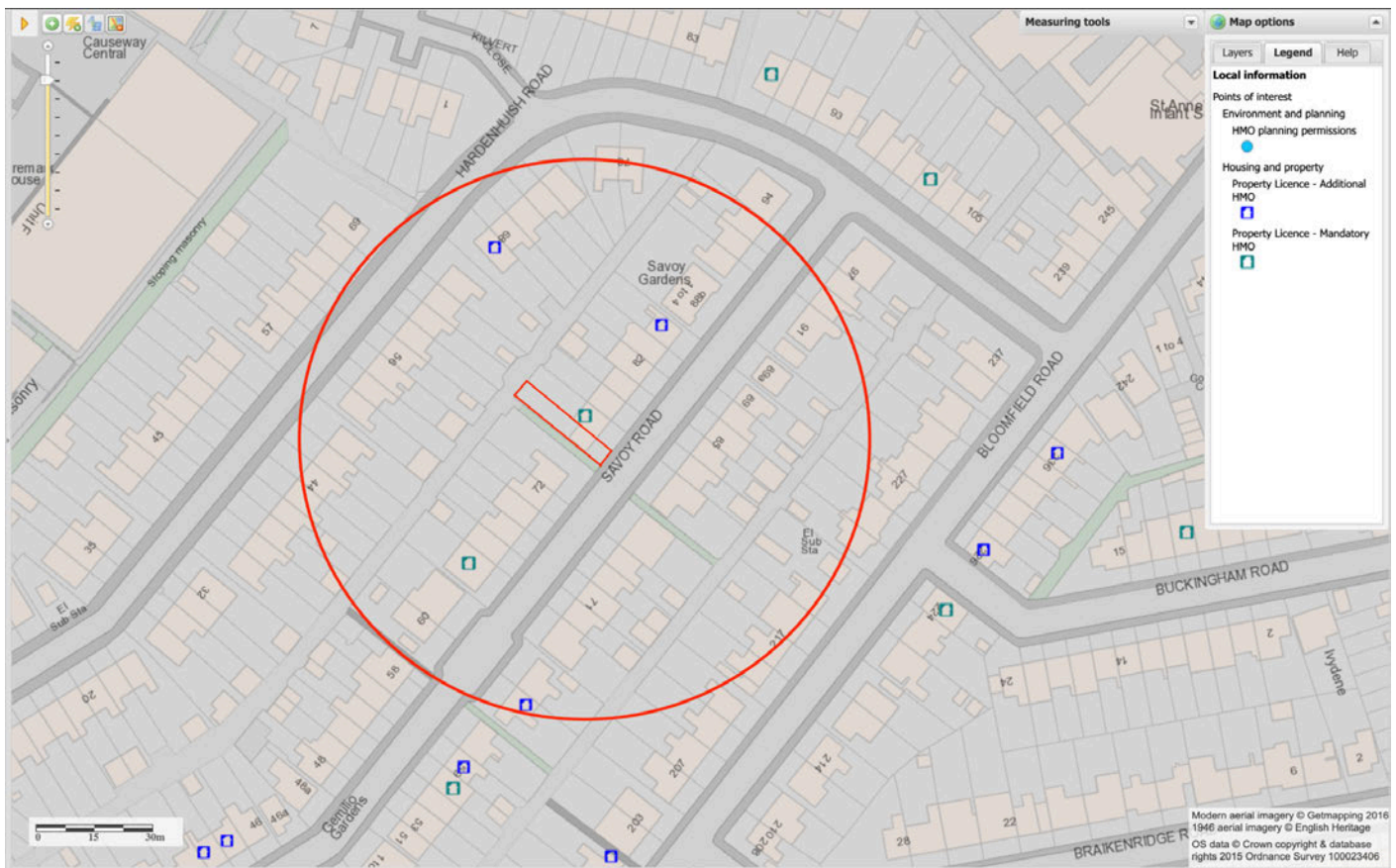
³ <https://www.bristol.gov.uk/council-homes/tackling-the-rent-crisis>

⁴ <https://www.hepi.ac.uk/2023/10/26/student-rents-now-swallow-up-virtually-all-of-the-of-the-average-maintenance-loan-as-market-reaches-crisis-point-in-affordability/>

The 2021 Census data reports that, in the Brislington West ward, 62.4% of dwellings were three bedroom or more, 23.6% two bedroom, and 14% one bedroom. This compares with city-wide figures of 55.4%, 28.4% and 16.2% respectively, indicating a relative imbalance on a local level between three-bed and one-bed dwellings in comparison with the city as a whole.

As such, the local housing stock is not sufficiently diverse enough to meet the projected needs of single persons solely through one-bedroom dwellings, which emphasises the requirement for HMO development to address this housing need. The proposed additional room would therefore help to meet an identified need for accommodation for single households, in an area where such accommodation is lacking, as can be seen through the rise in rental costs, and the increased levels of homelessness in the city.

“Managing the development of houses in multiple occupation” Supplementary Planning Document



Extract from Council's Pinpoint website (red circle indicates 100m radius).

The Council's 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD) identifies what constitutes a harmful concentration of HMOs. On a street level, this arises when a proposed dwelling is sandwiched between two HMOs. On a

neighbourhood level, this arises when HMOs comprises 10% or more of the housing stock within a 100-metre radius.

With regards to the former, the SPD states that sandwiching can occur when, inter alia, there is a single HMO property in any two of the following locations: adjacent, opposite and to the rear of a single residential property. However, it also goes on to say that sandwiching cannot occur across a separating road. As can be seen from the extract from the Council's Pinpoint website above, there is one existing HMO next door, but no others next door, adjacent or opposite and therefore no sandwiching would result.

In respect of the neighbourhood, the Council does not provide a tool for calculating the number of HMOs within 100 metres of a site, and therefore applicants/appellants are required to manually calculate this figure. In this case, the figures have been arrived at by drawing a 100-metre radius on the above map, and then checking Council Tax records for the number of dwellings within that area (including flat conversions, which count as separate dwellings).

Including the application site, there are only 6 existing HMOs within 100 metres of the site, out of 77 dwellings in total, resulting in an existing proportion of 7.8%. As the proposal is to increase the occupancy of an existing HMO, the proposal would not increase this figure.

The SPD also identifies a Good Standard of Accommodation, and proposes to adopt the current standards for licensable HMO properties. These state that a single bedroom should measure no less than 6.51sqm; the proposed development exceeds this requirement for all rooms. The standards also require 24sqm of communal living space for a 8-person HMO, which the proposal exceeds.

The acceptability of C4 to Sui Generis conversions in this area is well established, with comparable permissions granted at 23 Hillsborough rd, BS4 3QW, 516 Bath rd, Bristol, BS4 3JY, 59 Langton rd, BS4 4ER confirming that such use is compatible with the prevailing character and policy framework when amenity standards are met.

Ground-floor extension

The single-storey rear addition (shown hatched on Drawing no. 11 - PROPOSED GROUND FLOOR LAYOUT - A012) projects 4.36 m beyond the original rear wall while retaining more than adequate private amenity space of **21.9sqm** to the host property. Site levels fall at the rear by approximately **0.40 m** away from No. 76 Savoy Road; as a result, the extension sits appreciably within the 45-degree line taken from the centre of the nearest ground-floor habitable-room window at No. 76. With a flat roof profile, the proposal would not give rise to a material loss of daylight, sunlight or an undue sense of enclosure to that window. In addition, the neighbour at No. 74a has an existing outbuilding positioned directly along the boundary, which already restricts their own outlook towards this property. As a result, the proposal does not introduce any

new or additional sense of enclosure beyond what is already created by their built form.

Moreover, the public lane between the properties provides additional separation, further reducing any perceived impact on daylight, outlook or overbearing effects.

While the proposed single-storey rear extension projects beyond the typical 3–3.5 metre depth, SPD2 makes clear that this threshold is not a fixed limit and that the document is '*not intended to impose rigid controls*'. Extensions that exceed this depth can be acceptable where they do not result in an unacceptable loss of light, outlook or privacy.

In this case, although the extension exceeds the 45° plan-view line, it has been specifically designed with a flat roof and modest height to ensure it remains fully beneath the 25° vertical daylight line taken from the neighbour's rear window. This confirms that there will be no material loss of daylight or sunlight.

Furthermore, the rear gardens fall away from the houses, placing the neighbouring properties at a slightly higher ground level. This level difference substantially reduces the apparent height and mass of the extension when viewed from their side, significantly mitigating any potential overbearing impact.

Taking these factors together, the proposal accords with the aims of SPD2 by safeguarding neighbouring amenity, and the additional projection beyond 3.5 metres is considered entirely reasonable in this context.

First-floor extension

At first floor, the proposed depth matches the established rear projection at No. 76 Savoy Road, creating a coherent rear building line and a visually balanced pair. As the first-floor extension aligns with this existing built form, it does not project beyond the neighbouring rear elevation and therefore does not breach the 45-degree test when assessed from the closest habitable-room windows at either No. 76 or No. 74a. In particular, the 45-degree line taken from the rear windows of No. 74a sits well clear of the proposed first-floor addition, confirming that the proposal would not result in any material loss of daylight, sunlight or outlook to that property.

Overlooking is appropriately controlled through the use of matching materials and limited openings (with obscure glazing where applicable), ensuring that the first-floor element does not give rise to unacceptable overlooking of neighbouring gardens. The proposed addition remains proportionate and subservient to the host dwelling, consistent with the design principles of Policies DM30 and BCS21, and it preserves the character and amenity expectations of SPD2.

It is also relevant to note that the existing built form at No. 76 already results in a breach of the 45-degree line when measured from the closest habitable-room window at No. 76a. The established first-floor rear

projection at No. 76 sits within this notional sightline, demonstrating that the relationship between the two properties already includes a level of enclosure inherent to the historic layout. The proposed development at No. 76a does not intensify this existing relationship, nor does it introduce any new or additional infringement beyond what is already created by the neighbour's built form. In this context, the proposal simply reflects the established pattern of rear extensions along this part of Savoy Road and maintains a balanced and policy-compliant interrelationship between dwellings.

Design

Policy BCS21 states that new development should contribute positively to an area's character and identity, whilst policy DM30 states that extensions will be expected to respect the siting, scale, form, proportions, materials, details and the overall design of the host building and broader streetscene. In a similar vein, policy DM26 requires development to respect the local pattern and characteristics, and to respond to the height, scale, massing, shape, form and proportions of existing buildings. Finally, policy DM27 requires development to respect the layout and form of existing development.

The proposed additions are modest and clearly subordinate to the host dwelling, with form and detailing that respect the building's established character. The resulting scale and massing are appropriate to the plot and would not adversely affect the streetscene.

At first floor, the rear projection matches the established depth at No. 76 Savoy Road, creating a coherent rear building line and a balanced composition between the pair. On the opposite side, the public walkway separating the host property and No. 74 provides additional spacing, further mitigating any perceived impact on outlook and amenity.

The first-floor extension provides approximately **11.4 m²** of internal floorspace, with the ground-floor extension providing **20.1 m²**. External materials are proposed to **match the existing** to ensure visual continuity and compliance with the aims of **SPD2, Policy DM30 (Alterations to Existing Buildings)** and **Policy BCS21 (Quality Urban Design)**.

Residential amenity is preserved through:

- Bedroom sizes exceeding minimum licensing standards
- Adequate communal living space
- Existing private rear garden retained
- No overlooking or overbearing impact on neighbours

The extension complies with policies DM2, DM27, DM30 and BCS21.

Residential amenity

Policy DM30 requires extensions to existing buildings to safeguard the amenity of the host premises and neighbouring occupiers. Policy BCS21 states that new development should safeguard the amenity of existing development and create a high-quality environment for future occupiers. Policy DM27 expects that new development will *"enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight"*; and *"enable the provision of adequate appropriate and usable private...amenity space, defensible space, parking and servicing where necessary."*

Policy DM2 seeks to ensure that the conversion of properties to HMOs results in adequate residential amenity, does not result in harm due to excessive noise and disturbance, any impact upon street parking, the character of the dwelling or through inadequate refuse or cycle storage.

The requirement for a mandatory HMO licence will help ensure that the property is well- managed, and that the amenity of neighbours is not prejudiced. Whilst a common concern with regards to HMO conversions is an increase in noise and disturbance, these issues, should they arise, can be dealt with through environmental protection legislation, and it would be considered unreasonable to request an HMO management plan in respect of this planning application, or to condition the provision of any such plan, when this separate legislation would apply in any case. In conclusion, the proposal would not give rise to significant harm to neighbour amenity.

With regards to residential amenity, all the bedrooms would exceed the requirements for a single bedroom, and policy-compliant shared facilities (combined living room and kitchen) are proposed. The rear garden is adequate and private, and is considered sufficient for the proposed use.

Parking, cycle and refuse/recycling storage

The refuse and recycling provisions for the 8-bed large HMO is inline with the Council's Waste Guidance policy and the proposed storage has been moved to the front garden inline with section 2.4.3 Urban Living Supplementary Planning Document (SPD).

DM23 states that for both C4 and C3 dwellings, three bike storage spaces are required for properties with 3 or more bedrooms; no requirement is detailed for large HMOs. Notwithstanding, secure cycle storage for 8no. bicycles (one per bedroom) is proposed within the proposed bike store in the rear garden,

with 4no. Sheffield Stands to be installed, a minimum 1 metre apart, and a minimum 600mm from any wall.

The previously approved 4-bed scheme (20/03671/F) included a single rear parking space. However, this requirement pre-dated the current proposal and reflected an earlier layout that offered significantly less private amenity space. The site remains in a highly sustainable location with excellent access to public transport, local services and cycle routes, and the surrounding area continues to benefit from a good level of unrestricted on-street parking.

In order to deliver a meaningful and policy-compliant level of private amenity space for future occupiers, the rear parking space must be removed. Retaining it would severely compromise the usability, quality and functionality of the garden area, contrary to the aims of Policy DM2 and SPD guidance which prioritise adequate and high-quality amenity provision.

Given the sustainable context of the site, the absence of off-street parking is acceptable, and the proposal incorporates secure cycle storage to actively encourage sustainable travel. This approach reflects current planning priorities around reducing reliance on private cars and delivers a significantly improved living environment for future residents.

The Council has no adopted parking standard for large HMOs; DM23 states that the maximum number of spaces permitted for a C4 dwelling is 1.5 spaces (for properties with 3-6 bedrooms). This is in line with the supporting text to DM23, which states, *“The approach to the provision of parking aims to promote sustainable transport methods, such as walking, cycling and public transport, as encouraged by Core Strategy policy BCS10”* (para 2.23.7). The policy also states (in line with the NPPF), that development should not give rise to unacceptable traffic conditions.

Compared to the current 5 residents at the property, it is likely the proposed 8 person HMO would generate only a modest additional demand for on-street parking. Residents of the HMO would not be highly reliant on private car travel given the urban location, and the opportunities to walk from the property to local services and facilities. Including larger shops at Avon Meads Shopping Park, a Sainsbury Superstore at the end of the road, and smaller shops and bus stops on Sandy Park Road. The HMO would be located where sustainable travel patterns can be achieved, in line with Core Strategy policy BCS10.

Other issues

Biodiversity net gain

The Environment Act 2021 introduces the mandatory “biodiversity net gain” (BNG) requirement for new

housing and commercial development in England, subject to any exemptions that may apply. The exemptions that apply to the BNG requirements are habitats below a 'de minimis' threshold of 25 metres squared; or five metres for linear habitats like hedgerows.

As the proposal is for an extension measuring 23.3sqm, (shown on Drawing no. A011 as the hatched area) the development would be exempt from BNG requirements.

Coal mining risk

The site falls outside of the coal mining high risk development area so no CMRA has been provided.

Conclusion

The HMO SPD was adopted not to prevent HMOs, but to ensure that they are not overconcentrated in particular neighbourhoods, and to direct them towards areas with lower concentrations. The current proposal would not result in any one property being sandwiched between existing HMOs, and the proportion of HMOs within 100 metres would continue to remain below 10%. As such, there can be no in-principle objection to the occupancy rate of the property being increased by three bedrooms.

The Council recognises, in its Equalities Screening for the HMO SPD, that, *"It is possible that a reduction in the supply of HMOs at a local level may have a disproportionate impact on the groups who typically occupy this type accommodation - i.e. younger people (e.g. students), migrants and those on lower incomes. Impacts may include possible increases in rent and/or increases in commuting distances for work or studying."* Similarly, in respect of draft policy H6 (Houses in multiple occupation and other shared housing) of the new Local Plan, the Equality Impact Assessment lists the potential adverse effects of the policy as, *"Deprivation/Age (younger people): People including younger people on lower incomes in need of more affordable accommodation, such as HMOs/shared housing, may experience supply issues in areas where imbalance exists between this form of housing and other housing types."*

As this letter details, rents have risen across the city since the introduction of the HMO SPD, and supply has shrunk, and whilst correlation does not necessarily equal causation, it is axiomatic that prices rise as supply falls. In this context, it is all the more important for the Council to approve HMOs in areas where the 10% threshold has not yet been reached.

The proposals would provide additional accommodation for three people within an existing HMO, meeting a need identified in the latest SHMA and the Local Housing Needs Assessment, within an area where HMO and one-bedroom accommodation is currently at low levels. As such it would meet the aims of both BCS18 and DM2.

In the context of the Council not meeting the 2022 Housing Delivery Test (the fourth consecutive year that this has happened) and paragraph 11d of the NPPF currently being engaged, the proposal offers: social benefits through the provision of housing suitable for single person households, whilst providing communal living which can combat the acknowledged health

impacts of loneliness; economic benefits through increased spending in the locality; and environmental benefits through the more efficient use of land to provide increased accommodation (over the provision of new-build one-bedroom accommodation), and reduced energy use (the heating of one large building requiring less energy than the heating of eight individual flats).

The proposal would provide a high standard of accommodation and represent a valuable addition to the housing stock in a sustainable location, within good sustainable transport links.

The fee of £578 will be paid directly to the Planning Inspectorate in accordance with the Town and Country Planning (Fees for Applications) Regulations 2012, as the proposal includes both a material change of use and operational development; the highest relevant fee therefore applies.

Myself as the applicant will be responsible for payment.

Daniel Brown

[REDACTED]

[REDACTED]

If you have any further queries, then please do not hesitate to contact me.

Yours faithfully,

Daniel Brown of Habibo Homes Ltd