

# Planning Committee

16 October 2024



<b>Application No.</b>	24/01019/FUL
<b>Site Address</b>	22 Sidney Road, Staines-upon-Thames
<b>Applicant</b>	Mr Harvinder Chahal
<b>Proposal</b>	Proposed change of use from a single family dwelling (Use Class C3) to an 8 person House of Multiple Occupation (HMO) (Sui Generis).
<b>Case Officer</b>	Kelly Walker
<b>Ward</b>	Staines
<b>Called-in</b>	Cllr Gale has 'called in' the application due to concerns raised by neighbouring properties including parking pressures.

<b>Application Dates</b>	Valid: 03.09.2024	Expiry: 29.10.24	Target: Within 8 weeks
<b>Executive Summary</b>	<p>The subject property is a six bedroomed, two-storey detached Victorian dwelling, with accommodation at second floor level within the roof space. The property has an integral garage and an outbuilding to the rear. The site is square shaped and located on the south eastern side of Sidney Road, surrounded by other residential properties. The site is located in the 1 in 1000 flood zone (Flood Zone 2).</p> <p>According to Schedule 2, Part 3, Class L of the General Permitted Development Order (2015), the property could be used as a House of Multiple Occupation (HMO) for six residents without planning permission. The current proposal requires planning permission as it proposes an HMO for up to eight people, resulting in two additional residents from what could be carried out without the need for planning permission.</p> <p>Therefore, the main issue is whether the change of use to an HMO for eight residents, would result in an intensity of use which would result in detriment to the amenity of neighbouring properties by reason of the additional two people, over and above that for six residents (which can be carried out without permission).</p> <p>The existing family dwelling has accommodation over three floors, with some ground floor additions. It also has an attached garage, outbuilding and a rear garden, with off-street parking at the front/side for a number of vehicles. The ground floor layout will provide an open plan kitchen/diner/lounge as communal space. As such it is considered to provide an adequate level of amenity for future occupiers. The addition</p>		

	<p>of two more occupants over the six that can be accommodated in a property without the need for planning permission is not considered to amount to an intensity of use, of this particular property on this site, that would lead to a harmful impact on the amenity of neighbouring residential properties.</p> <p>There are no objections on transportation matters. The County Highways Authority raises no objection to the proposal and the level of parking is acceptable in this sustainable location.</p> <p>The proposal is therefore considered to be acceptable</p>
<b>Recommended Decision</b>	Approve the application subject to conditions

## MAIN REPORT

### 1. Development Plan

- 1.1 The following policies in the Council's Core Strategy and Policies DPD 2009 are considered relevant to this proposal:
- SP6 (Maintaining and improving the Environment)
  - EN1 (Design of New Development)
  - EN11 (Development and Noise)
  - EN15 (Development on Land Affected by Contamination)
  - CC2 (Sustainable Travel)
  - CC3 (Parking Provision)
- 1.2 The policies contained within the National Planning Policy Framework (NPPF) (December 2023) are also relevant. The Government also published a draft revised NPPF in July 2024, which has not currently been adopted. The draft NPPF is given limited weight currently.
- 1.3 On 19 May 2022, the Council agreed that the draft Spelthorne Local Plan 2022 – 2037 be published for public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The public consultation for the Pre-Submission Publication version of the Local Plan ended on 21st September 2022 and the local plan was submitted to the Planning Inspectorate on 25th November 2022.
- 1.4 An Examination into the emerging Local Plan commenced on 23 May 2023. However, on 6 June 2023, the Council resolved to request that the Planning Inspector pause the Examination for a period of three (3) months to allow time for the new council to understand and review the policies and implications of the emerging Local Plan. After the three month pause the Council would decide what actions may be necessary before the Local Plan Examination should proceed.
- 1.5 At the meeting of the Council on 19 July 2023, it was agreed that Catriona Riddell & Associates be appointed to provide 'critical friend' support to inform the options for taking the Local Plan process forward.
- 1.6 On 14 September 2023, the Council considered a report following the deferral in June. The report listed three options; to continue with the local plan to include further work (especially on design codes), to request a further pause, or to withdraw the local plan. On the day of the meeting, a letter was received from the Housing Minister stating that the Housing Secretary was directing the Council "not to take any step to withdraw the plan from examination..." The Council resolved to extend the pause in the Examination timetable until the proposed changes to the NPPF had been published before determining the next steps.

- 1.7 On 22 September 2023, the Inspector agreed to a further pause to the Examination and requested that the Council continue to address the issues that he identified in the first week of the Examination, in particular flood risk and its potential implications in relation to the site allocation and delivery strategy of the plan.
- 1.8 On 10 November 2023, the Environment Agency (EA) provided comments on Spelthorne's Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) seeking additional information, amendments and updates to the assessment.
- 1.9 Following the Environment & Sustainability Committee meeting on 29 February 2024, it was resolved to propose, to the Planning Inspector, modifications to the emerging Local Plan, including the removal of all Green Belt site allocations, with the exception of two allocations that meet the need for Gypsy, Traveller and Travelling Showpeople, the removal of site allocations at high risk of flooding and to move some higher flood risk sites to the later plan period (years 11-15), and the withdrawal the Staines Development Framework as a core document.
- 1.10 On 19 March 2024 the Council published updated Level 1 and Level 2 SFRA. On 2 May 2024 the EA provided comments, including a request for additional clarification which was provided on 17 May 2024.
- 1.11 On 18 July 2024, Council considered a report into the resumption of the Local Plan Inquiry which had previously been agreed by the Corporate Policy and Resources Committee on 8 July 2024. The report set out the recent response from the Environment Agency, and the options for deciding whether or not Council agreed a request for further Main Modifications to the Local Plan in order to resume the Examination hearings and progress the Plan to adoption. Council agreed the option to progress the local plan and officers have now requested this from the Inspector.
- 1.12 The following policies of the Pre-Submission Spelthorne Local Plan 2022 – 2037 are of relevance:
- ST1: Presumption in Favour of Sustainable Development.
  - ST2: Planning for the Borough.
  - PS2: Designing places and spaces.
  - E1: Green and Blue Infrastructure.
- 1.13 The NPPF policy states at para 48 that: Local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

1.14 Section 38(6) the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan (unless material considerations indicate otherwise) and not in accordance with an emerging plan, although emerging policies may be a material consideration.

1.15 At this stage, the policies in the Pre-Submission Spelthorne Local Plan carry limited weight in the decision-making process. The adopted policies in the 2009 Core Strategy and Policies DPD carry substantial weight in the determination of this planning application.

## 2. Relevant Planning History

2.1 The site has the following planning history:

PLAN N/FUL/74/9	Proposed 6 flats and garages.	WITHDRAWN 06.11.1974
-----------------	-------------------------------	-------------------------

## 3. Description of Current Proposal

3.1 This application relates to 22 Sidney Road which is situated on the south eastern side of the road on a square-shaped plot. The site is located on this residential road, where many of the plots are large with wide frontages, most with off-street parking at the front and rear gardens behind. There are other detached and semi-detached dwellings along Sidney Road, including the detached dwellings at No. 20 to the west and No. 24 to the east and the pair of semi-detached dwellings opposite at No's.21/23 Sidney Road. Although the plot is wide, it is not as deep as the neighbouring properties and backs onto another dwelling. The site backs onto the rear garden of the detached chalet style dwelling of Holly Cottage, located along Rosefield Road, although set back behind other development on the street frontage. Kingston Road is located to the south with Staines Railway Station and bus stops within walking distance. In addition, the site is within walking distance of Staines town centre and all its facilities. The site is located within the 1 in 1000 flood zone (Flood Zone 2).

3.2 The property is a two-storey detached Victorian dwelling which has some rear additions at ground floor level. There is accommodation on the second floor within the roof. As such the existing family dwelling currently has six bedrooms on the first and second floors, with living accommodation on the ground floor, including a reception room, lounge, dining room and kitchen, with three bathrooms overall. There is an enclosed rear garden with an outbuilding and an attached garage to the side. The site is also completely laid to hardstanding to the front and side providing a drive for off-street parking.

3.3 This application is for the change of use from a dwelling (use Class C3) to a House of Multiple Occupation (HMO) (Sui Generis) and shared living facilities for occupants for up to eight people.

## 4. Consultations

4.1 The following table shows those bodies consulted and their response.

<b>Consultee</b>	<b>Comment</b>
Environmental Health Officer (HMO)	No objection
County Highway Authority	No objection
Neighbourhood Services (refuse)	No objection recommends an informative

## **5. Public Consultation**

5.1 The Council has sent letters to 41 properties. At the time of writing 54 letters of representation have been received objecting to the proposal on the following grounds:

- Out of character
- Should not be allowed to convert this attractive family home to HMO
- Loss of family house
- Noise and disturbance
- Parking pressures/traffic
- Parking spaces insufficient
- Too many units
- Too small rooms
- Intensity of use
- Overcrowding/overdevelopment
- Already lots of small flats in Staines
- Already lots of HMOs nearby
- Refusal of permission for HMO opposite (No.19) and already one at no. 10 (which is in a poor state of repair)
- Anti-social behaviour
- Safety concerns
- Accumulation of rubbish
- Flooding/drainage
- Inadequate surrounding infrastructure
- Shared facilities cause problems
- Poor management
- Overlooking of Holly Cottage to rear
- Inadequate fire escape from top floor
- Transient residents
- HMO does not contribute to stable communities
- Shortage of dwellings suitable for families
- kitchens and bathrooms - not suitable for the number of inhabitants
- Could be more people living there some rooms double or conversion in future and difficult to control
- Article 4 direction
- Set precedent

Other issues which are not planning matters which have been referred to include: -

- Conflict of interest due to applicant's job

- Pre-application advice
- Applicant previously objected to other HMOs in the road
- Work has already commenced
- No notice/poorly located notice
- Being done for profit
- Decrease in the value of neighbouring properties

## 6. Planning Issues

- Principle
- Residential amenity.
- Parking & highways.
- Biodiversity

## 7. Planning Considerations

### Principle

- 7.1 The Use Classes Order defines Use Class C3 as a dwelling house (whether or not as a sole or main residence). (a) by a single person or people living together as a family, (b) by not more than six residents living together as a single household (other than a use of within Class C4). Class C4 is classified as a house in multiple occupation that is used by not more than six residents as an HMO. Under the Government's Uses Classes Order, planning permission is not required to move from Use Class C3 to C4 and vice versa i.e. from a family dwelling to a six person HMO.
- 7.2 Consequently, the property could be used as an HMO for six residents without requiring planning permission, as could a much smaller terraced family home with no off street parking. There is, therefore, no 'in principle' planning objection to the use as an HMO for six persons. Therefore, the question that needs to be addressed is whether the use change from a small HMO of no more than six residents to an HMO for eight residents (by an additional 2 people) is acceptable in planning terms.
- 7.3 The site is situated in a predominantly residential area characterised by two-storey houses, detached and semi-detached. The existing property is a six bedroom, two-storey detached dwelling, with three bathrooms. The subject property has accommodation over three stories with an attached garage and outbuilding. As such, the property provides a substantial amount of accommodation over three stories. There is a private rear garden and a driveway for a number of vehicles to the front/side of the site. The proposal will provide bedrooms for eight people, with two bedrooms on the ground floor, and a further three bedrooms on both the first and second floor levels. There will also be communal space on the ground floor, providing a large

open plan kitchen/lounge/diner and a bathroom, for use by its occupants. The occupants will also have access to the garage and the outbuilding

- 7.4 There are minimal internal changes required to the existing property to convert it to the proposed eight person HMO. Given the location and size of the property, which is currently a six bedroom house on a wide plot, it is considered that the proposal for two additional residents, over and above what could be carried out without planning permission, would not result in a significant intensification of the use to that possible under permitted development. Therefore, the principle of an eight person HMO at the site is considered to be acceptable.

#### Amenity of future occupants

- 7.5 It is reasonable to expect that future occupants should have access to good standard of communal accommodation in which to prepare food, dine and mix with fellow residents. The NPPF requires spaces that promote health and well-being, with a high standard of amenity for future users. Social interaction is important for mental health and well-being. Each bedroom is of sufficient size with a good size window for outlook and light. The proposal provides a functional space for the HMOs' future occupants, including the open plan lounge/diner/kitchen and access to a rear garden, as well as use of the attached garage and outbuilding. Although the Council does not have any minimum requirements for garden sizes for HMOs, the SPD minimum size of a garden for a three or more bedroom semi-detached or detached dwellings home is 70 sq. m. The proposal will provide a rear garden area of some 120 sq. m and therefore this is considered to be acceptable. It is accessed from the communal indoor space and is square in shape to provide a useable external space.
- 7.6 The internal layout of the first and second floors would be mainly unchanged, apart from the addition of another bathroom (to make four in total) on the second floor and enlarging an existing bathroom on the first floor. The existing bedrooms will continue to be bedrooms. The existing ground floor lounge and living room will be converted to a further two bedrooms.
- 7.7 Each bedroom would be of a sufficient size to accommodate one bedspace (eight people in total) ensuring that it has a floor area of at least 7.5 sq. m and will be at least 2.55 sq. m wide as per the Government's nationally described Technical Housing Standards (March 2015). A planning condition would be imposed in order to limit the number of residents to eight, as is the usual way to control occupancy numbers for HMOs. The shared open plan kitchen/lounge/diner would be located on the ground floor of the property, which is considered to be sufficient in size for the number of occupants. There will be four bathrooms at least one on each floor. Residents would also have access to a shared rear garden, outbuilding and garage, and have cycle and refuse storage facilities.



- 7.8 The Council's Environmental Health Department has been consulted and an Environmental Health Officer (EHO) has noted that ,

*'...The property would appear to be capable of meeting the standards required for a licensable HMO, subject to the loft rooms being able to meet the minimum space requirement of 6.51sqm for a single occupant when disregarding any floor space where the ceiling height is less than 1.5m (5ft). I suggest that the applicant be directed to our website <https://www.spelthorne.gov.uk/hmo> where they can download our Landlords' Guide to Standards for HMOs as well as access information and an application for an HMO licence. An HMO application will be required if the property is occupied as an HMO by 5 or more occupants.*

*The property would need to meet building regulation requirements to ensure that adequate noise (as well as fire) separation exists between the individual units of accommodation and also the communal parts of the property. To protect residents from external noise, in particular traffic from nearby main roads, we would expect double glazing as a minimum to be provided to all units of accommodation.*

*Assuming all the above considerations are made, Environmental Health would have no objection to the application.'*

- 7.9 The applicant has submitted a section drawing to show the head room for the rooms in the loft space, which are existing bedrooms. This shows that these rooms do meet the minimum floor area requirement noted by the EHO and therefore the size meets the minimum requirement and is acceptable. As noted above, the applicant will need to submit an HMO licence application, which is also the case for an HMO for six people, and the proposal will be subject to Building Regulations which will review fire safety.

- 7.10 The quality of the communal space provided within the development is considered to be sufficient and would provide an acceptable living environment for its future residents

#### Amenity of neighbouring properties

- 7.11 In regard to the impact on the amenity of neighbouring properties, Policy EN11 sets out the Council's general approach to minimise the impact of noise refers to noise by reducing noise levels from noise generating activities and locating noise sensitive development away from sources of high noise.
- 7.12 The proposal does not include any extensions, and the existing building will be converted for the proposed use, which continues to be residential in nature. As such, no new building or indeed windows will be introduced, and the proposal will remain in residential use. Therefore, it is not considered that the proposal would lead to harmful overlooking or loss of privacy to the property to the rear at Holly Cottage, as the relationship will remain the same as existing.

- 7.13 The proposal provides good sized bedrooms and shared communal spaces, including the garden and off-street parking. Therefore, it is considered that the number of occupants would be able to be comfortably accommodated in the subject property. The property is located along a residential road adjoining other dwellings. The subject property adjoins three other residential properties. There are also some flats and other HMOs located in the vicinity and as such a mixture of types and sizes of housing is available nearby. The site is located in a sustainable location, within walking distance of Staines Town Centre and close to the railway station and bus stops. As noted, an HMO for six people can be created under Permitted Development, and the proposal is for two additional residents in a large detached property over three stories. Consequently, it is not considered to have a significant impact on neighbouring residential properties that would justify refusal on these grounds.

#### Parking Provision

- 7.14 Policy CC3 states that the Council will require appropriate provision to make for off-street parking in development proposals in accordance with its maximum parking standards. In considering the level of provision the Council will have regard to the anticipated demand for parking arising from the use proposed, or other uses to which the development may be put without needing planning permission.
- 7.15 Third party representations have raised concerns about parking pressures. The County Highway Authority (CHA) has been consulted on this application and has advised that It is noted that there will be three off-street parking spaces retained which is considerably less than the number of potential occupiers. However, the site is located in a sustainable location with access to facilities and amenities within walking and cycling distance. The site also has good opportunities for use of public transport. As a result, the CHA does not object to the proposed parking provisions and raises no transportation objections.
- 7.16 The property has a front/side driveway, along with a garage and an outbuilding, which could provide parking for a number of cars, including the use of the attached garage. However, only three spaces can be used independently of one another. In addition, there are opportunities for future occupiers to make journeys by foot or by cycle. The application site is located in a sustainable location, within walking distance of Staines Town Centre. Staines Railway Station, and bus stops on Kingston Road and London Road are also nearby. As such, it is considered that this location is sufficiently accessible to the extent that it would not be a necessity for future occupiers to own their own private cars. Cycle storage will also be provided on site to encourage a sustainable travel mode
- 7.17 The Council's parking standards do not have any specific guidelines on HMO's. Similarly, Surrey County Council's Vehicle, Cycle and Electric vehicle parking guidance for New Development (Nov 2021) does not provide any specific parking standards for HMO's for sui generis uses, and it states that

individual assessment/justification is required. In this particular case it is considered that an HMO for eight occupants is likely to have the potential to generate greater parking demand than the existing use as a large residential dwelling which requires 2.5 spaces. However, it is considered that the provision of three car parking spaces would be adequate for a scheme of this size and in this sustainable location. In addition, there is a Permitted Development fall back of a six bed HMO, whereby parking provisions cannot be considered.

- 7.18 The National Planning Policy Framework states that development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or where the residual cumulative impact on the road network would be severe. For any objection to be valid, the authority must demonstrate the harm that the development would result in. It is considered that the parking provision at the site would be acceptable in this location, and the CHA does not consider the development is likely to result in material harm in respect of highway safety or capacity.
- 7.19 It is therefore considered that the proposed parking provision would not conflict with Policy CC3 of the Spelthorne Core Strategy and Policies Development Plan Document (2009) and is acceptable.

#### Biodiversity

- 7.20 Policy EN8 of the CS&P DPD states that the Council will seek to protect and improve landscape and biodiversity in the borough. It is relevant to note that the application is not subject to the National Biodiversity Net Gain requirements as it involves a change of use. In addition, the proposal includes the addition of a landscape area to the front of the property which will break up and soften the large area of hardstanding and the building itself and will provide some ecological benefits.

#### Other matters

- 7.21 Neighbourhood Services have been consulted on refuse storage and have raised no objection but recommend an informative.

It is understood that applicant's wife works for a charity which is located at the Council Offices. She is not employed by Spelthorne Borough Council; however, this application is being taken to Planning Committee for determination, as it would if the applicant was employed by the Council.

Pre-application advice is common practice where applicants can seek feedback before they submit an application and often leads to improved schemes.

Although works have already commenced at the site, this appears to be refurbishments which in themselves, would not require planning permission. As noted, it is only the use of the building for an HMO for more than six people that needs permission.

The display of a site notice is not mandatory in this instance, as neighbours were written to.

An Article 4 Direction is to be introduced in parts of Staines in August 2025 and is not relevant at this time. It will mean that planning permission will be required for an HMO of any size. It does not mean HMOs cannot be implemented but planning permission will be required. However, the decision making process will still have to take account of what could usually be carried out under permitted development.

Each planning application must be assessed in its own right and on the basis of what is being proposed, not what might happen in the future. The value of neighbouring properties is not a planning matter.

### Financial Considerations

- 7.22 Under S155 of the Housing and Planning Act 2016, Local Planning Authorities are now required to ensure that potential financial benefits of certain development proposals are made public when a Local Planning Authority is considering whether or not to grant planning permission for planning applications which are being determined by the Council's Planning Committee. A financial benefit must be recorded regardless of whether it is material to the Local Planning Authority's decision on a planning application, but planning officers are required to indicate their opinion as to whether the benefit is material to the application or not. It is relevant to note that the proposal is not a CIL chargeable development. The proposal will generate Council tax payments which is not a material consideration in the determination of this proposal.

### Equalities Act 2010

- 7.23 This planning application has been considered in light of the Equality Act 2010 and associated Public Sector Equality Duty, where the Council is required to have due regard for:
- 7.24 The elimination of discrimination, harassment and victimisation; The advancement of equality of opportunity between persons who share a relevant protected characteristic and person who do not share it; The fostering of good relations between persons who share a relevant protected characteristic and person who do not share it; which applies to people from the protected equality groups.

### Human Rights Act 1998

- 7.25 This planning application has been considered against the provisions of the Human Rights Act 1998.
- 7.26 Article 8 and Protocol 1 of the First Article confer a right to respect private and family life and a right to the protection of property, i.e. peaceful enjoyment of one's possessions which could include a person's home, and other land and business assets.

- 7.27 In taking account of the Council policy as set out in the Spelthorne Local Plan and the NPPF and all material planning considerations, Officers have concluded on balance that the rights conferred upon the applicant/ objectors/ residents/ other interested party by Article 8 and Article 1 of the First Protocol may be interfered with, since such interference is in accordance with the law and is justified in the public interest. Any restriction of these rights posed by the approval of the application is legitimate since it is proportionate to the wider benefits of such a decision, is based upon the merits of the proposal, and falls within the margin of discretion afforded to the Council under the Town & Country Planning Acts.

### Conclusion

- 7.28 It is considered that the proposed development would not have a significant impact on the amenities of neighbouring properties that would justify refusal. The proposed addition of two further residents in this detached property, compared to the Permitted Development allowance for an HMO of six people, is not considered materially harmful to justify refusal. The bedrooms and communal space, as well as the garden, provides a development which is of a sufficient size for future occupants, and it is considered that the parking provision is acceptable in this location. Accordingly, the application is recommended for approval.

## **8. Recommendation**

- 8.1 APPROVE subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: -. This condition is required by Section 91 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans). M/662/01, 02, 03, 04, 05, 06,07 and 08-22 A received on 27 September 2024

Reason: -. For the avoidance of doubt and to ensure the development is completed as approved.

3. The occupation of the House of Multiple Occupation (HMO) hereby permitted shall be limited to a maximum of 8 residents at any time.

Reason: To safeguard the amenity of future residents of the property and neighbouring properties.

4. Prior to the occupation of the development, details of the refuse and recycling facilities shall be submitted to and approved in writing by the Local Planning Authority. The agreed facilities shall be installed prior to the occupation of the development and retained thereafter.

Reason: To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties and the appearance of the locality in accordance with policies SP6 and EN1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

5. Prior to the occupation of the development, details of the cycle storage facilities shall be submitted to and approved in writing by the Local Planning Authority. The agreed facilities shall be installed prior to the occupation of the development and retained thereafter.

Reason: To safeguard the amenity of future residents of the property and neighbouring properties.

#### Informatives

1. In accordance with Approved Document S of the Building Regulations, you will be required to install electric vehicle charging facilities.
2. A license will be required to operate the property as a HMO. Please contact the Councils Environmental Health Department.
3. The property will not receive any more bins than the standard household allocation of 1 x 240 rubbish and 1 x 240 recycling, emptied on a fortnightly basis.

Any additional capacity or collections required for the tenants to manage their waste (and there will be as two bins are insufficient for 8 inhabitants) would be the responsibility of the landlord to seek/arrange on a commercial basis.