

OBJECTION TO PLANNING APPLICATION PL/2026/00390

1. Introduction

I wish to formally object to Planning Application PL/2026/00390.

The submitted application fails to demonstrate compliance with:

- The adopted Core Strategy
- The Local Development Framework
- The Town and Country Planning Act 1990
- The National Planning Policy Framework (2025)

No substantive planning policy assessment has been provided to justify the proposed change of use.

2. HMO Management Plan

No comprehensive HMO Management Plan has been submitted to demonstrate:

- How the intensified use will be managed;
- How amenity impacts will be mitigated;
- How noise, waste, parking, and general tenant behaviour will be controlled;
- How the property will operate without detriment to neighbouring occupiers.

3. Design Principles & Accommodation Standards

No evidence has been submitted to demonstrate:

- That the level of accommodation proposed is appropriate to the size and layout of the property;
- That internal space standards are compliant;
- That intensified occupation over three floors is suitable within a listed structure.

4. Site and Surroundings

No evidence has been provided to demonstrate:

- That the surrounding area is characterised by comparable intensified occupation;
- That the proposal reflects the established residential character;
- That significant landscape features and heritage assets have been properly assessed.

5. Heritage Impact

The application site forms part of a Grade II listed building as recorded by Historic England:

- Early C19 ashlar construction
- Hipped asbestos cement tile roof
- Six double-hung sash windows with glazing bars
- Continuous string course and segmental arches
- Prominent position overlooking the town

Budbury House forms part of an important listed group within Tory.

The application fails to provide:

- A comprehensive Heritage & Conservation Statement;
- An assessment of the historical form and function of the building;
- An assessment of how intensified occupation affects the significance of the listed building;
- An assessment of impact on the wider conservation area.

This omission is a significant procedural and policy failing.

6. Historical Development & Subdivision

Historical Ordnance Survey mapping confirms the site originated as a late Georgian industrial building, later subdivided into three terraced dwellings during the early 1980s.

Building Regulations and Fire Safety standards have significantly changed since that time.

No evidence has been provided to demonstrate:

- That the building meets current fire compartmentation standards;
- That further subdivision and intensified occupation would comply with modern safety requirements;
- That structural, acoustic and fire separation standards are adequate.

7. Highway Safety & Traffic Impact

Adopted Highway

The adopted highway:

- Is heavily used by residents and visitors;
- Serves Budbury Place, Tory and Tory Place;
- Is used by pedestrians including school children;
- Is already fully subscribed for parking most days and evenings.

No traffic survey or parking demand assessment has been submitted.

No evidence has been provided to demonstrate that five separate occupancies will not materially increase:

- Vehicle movements;
- Parking demand;
- Delivery traffic;
- Visitor parking pressures.

Private Single-Track Road

The private road:

- Is a no-through road;
- Is shared by pedestrians and vehicles;
- Has no pavement;
- Has no street lighting;
- Is already deteriorating.

The proposal will introduce five separate occupancies within a gated community currently comprising five family dwellings.

No assessment has been provided regarding:

- Increased vehicular movements;
- Amenity impacts;
- Road safety implications;
- Maintenance burden.

8. Budbury Place Car Park

The car park is already fully subscribed.

No parking stress survey or capacity assessment has been submitted to demonstrate that additional occupancy will not:

- Displace existing users;
- Increase congestion;
- Increase informal or unsafe parking.

9. Block Plan Inaccuracies

The line of junction (boundary) shown on both the existing and proposed block plans is incorrect.

No supporting evidence has been provided to substantiate the boundary alignment presented.

10. Disabled Accessibility

No evidence has been provided to demonstrate:

- Compliance with accessibility requirements;
- Provision for wheelchair access or storage;
- Stair assistance measures;
- Adapted bathroom facilities;
- Disabled parking provision;
- Safe access to stepped garden areas.

Given occupation over three floors, this omission is significant.

11. Noise and Disturbance

No acoustic assessment has been submitted.

No evidence has been provided to demonstrate:

- Existing sound insulation standards;
- Fire and acoustic separation between adjoining properties;
- That intensified occupation will not result in unacceptable noise transfer.

12. Visual Impact & Privacy

No assessment has been provided to demonstrate that:

- The visual character of the gated community will be preserved;
- Overlooking will not increase;
- Loss of privacy will not occur.

13. Local Housing Stock

The property is currently occupied by a family of three.

No evidence has been provided to demonstrate:

- That loss of a family dwelling aligns with local housing need;
- That conversion to HMO will positively contribute to housing mix;
- That the proposal supports the vitality of the town.

14. Energy Performance & Fabric

Previous EPC (expired 17 September 2018): F rating.

Current EPC (expires 28 July 2029): C rating.

No supporting documentation has been provided detailing:

- Location and specification of partial wall insulation;
- Roof line barrier improvements;
- Fabric upgrade methodology within a listed structure.

15. Humidity & Ventilation

No assessment has been submitted regarding:

- Current humidity levels;
- Ventilation systems;
- Future humidity impacts arising from intensified occupation.

16. Fire Safety

Listed buildings present elevated fire risk.

No evidence has been provided demonstrating:

- Adequate cavity barriers;
- Roof void fire stopping;
- Fire compartmentation between adjoining properties;
- Protected escape routes over three floors;
- Smoke control measures.

17. Parking Provision

The proposal indicates:

- Four vehicles parked on the driveway;
- One garage used for cycle storage;
- No clear strategy for the double garage;
- Increased reliance on the private single-track road.

No assessment has been submitted demonstrating that this arrangement will not:

- Increase noise and disturbance;
- Increase emissions;
- Increase safety risks.

18. Access & Egress Safety

Vehicles regularly enter and exit the private road at speed.

No traffic calming measures have been proposed for:

- Access from the adopted highway;
- Egress onto the adopted highway.

19. Conservation Area Impact

No comprehensive assessment has been provided to demonstrate:

- That intensified occupation preserves or enhances the conservation area;
- That mitigation measures are proposed.

20. Sustainable Location

No evidence has been submitted to demonstrate compliance with sustainable location principles.

21. Waste & Recycling

No comprehensive waste management strategy has been submitted detailing:

- Waste storage capacity;
- Recycling facilities;
- Collection arrangements;
- Impact on residential amenity;
- Odour or nuisance impact.

Conclusion

The applicant has failed to provide sufficient evidence to demonstrate that the proposed change of use:

- Complies with planning policy;
- Preserves the character of the listed building;
- Preserves or enhances the conservation area;
- Protects residential amenity;
- Maintains highway safety;
- Provides adequate parking;
- Ensures fire safety compliance;
- Protects disabled accessibility;
- Prevents unacceptable noise and disturbance.

In the absence of robust technical evidence, heritage assessment, highway analysis, and amenity impact assessment, the proposal is unsound in planning terms and should be refused.