

Formal Objection 4 to Planning Application PL/2026/00390

Proposed Change of Use from C3 Dwellinghouse to C4 House in Multiple Occupation (HMO) 16 Budbury Place, Bradford on Avon, BA15 1QF.

To: Wiltshire Council

Dear Head of Development Management

I am the owner/occupier of the property directly adjoining 16 Budbury Place and share a party wall and structural elements with the application property. I wish to formally object to the proposed change of use from a single dwelling (Use Class C3) to a five-bedroom House in Multiple Occupation (Use Class C4).

My objection is grounded in concerns regarding structural integrity, intensified servicing requirements, and harm to the significance of this Grade II listed terrace within a gated community. I consider the proposal to conflict with national heritage policy set out in the National Planning Policy Framework.

1. Statutory and Policy Duty to Preserve Listed Buildings

Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the local planning authority must have special regard to the desirability of preserving a listed building and its setting.

The NPPF reinforces this statutory duty. In particular:

- **Paragraph 205** requires great weight to be given to the conservation of designated heritage assets.
- **Paragraph 206** states that any harm to the significance of a designated heritage asset should require clear and convincing justification.
- **Paragraph 208** confirms that even less-than-substantial harm must be weighed against public benefits.

The application concludes there will be no harm because no external alterations are proposed. This is an unduly narrow interpretation of heritage impact and fails to properly assess how intensified occupation affects the building's significance.

2. Failure to Properly Assess Impact on Significance (NPPF Paragraph 200)

Paragraph 200 of the NPPF requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting, at a level of detail proportionate to the asset's importance.

The Design and Access Statement does not provide:

- A detailed assessment of the building's historic fabric
- An evaluation of how intensified use affects internal character and structural integrity
- Consideration of the terrace as a unified historic structure

As adjoining properties share structural walls and elements, intensified use of one unit inevitably affects the whole. The submission does not adequately assess this interrelationship.

3. Intensification of Use as Heritage Harm

Harm to a listed building is not limited to external alterations. Increased occupancy associated with a five-bedroom HMO typically necessitates:

- Fire compartmentation and fire door upgrades
- Interlinked alarm systems and service installations
- Cavity and roof fire barriers
- Fire barriers around external doorways and windows
- Emergency lighting, protected escape routes and staircases
- Additional plumbing and extraction systems

These interventions often require alteration to historic doors, ceilings, floors, and masonry.

Furthermore, intensified occupation results in:

- Increased vibration and load transfer through shared party walls
- Greater moisture generation and risk of damp migration
- Accelerated wear to original fabric

Such impacts may amount to **less-than-substantial harm**, but under NPPF Paragraph 208 this still requires clear public benefits to outweigh the harm.

No such clear public benefits have been demonstrated.

4. Lack of Clear and Convincing Justification (NPPF Paragraph 206)

The proposal is described as meeting a need for shared accommodation. However, no robust evidence is provided that:

- There is a specific unmet need for this form of accommodation in this location; or
- That this need outweighs the risk of harm to a designated heritage asset.

The mere fact that permission was previously granted does not constitute clear and convincing justification under current policy.

5. Direct Impact on Shared Fabric and Neighbouring Heritage Interest

As the adjoining owner sharing a party wall, I am directly affected by:

- Structural loading changes
- Service penetrations within shared masonry
- Moisture and acoustic transfer
- Cumulative internal alterations

The terrace operates as a coherent historic structure. The intensified use of one part affects the performance and preservation of the whole. This relationship has not been properly assessed in accordance with Paragraph 200 of the NPPF.

6. Planning Balance

Under Paragraphs 205–208 of the NPPF, great weight must be given to conserving the listed building’s significance. Even where harm is considered “less than substantial,” that harm must be clearly outweighed by public benefits.

The proposal offers:

- No enhancement to the heritage asset
- No community facility
- No design improvement
- No clear public benefit beyond private rental accommodation

Accordingly, any heritage harm — even if characterised as less than substantial — is not outweighed.

Conclusion

The proposal fails to:

- Properly assess the impact on the significance of a designated heritage asset (NPPF Paragraph 200);
- Demonstrate that great weight has been given to conservation (Paragraph 205);
- Provide clear and convincing justification for harm (Paragraph 206);
- Demonstrate that any less-than-substantial harm is outweighed by public benefits (Paragraph 208).

As an adjoining owner sharing structural fabric, I consider the risks to be real, direct, and insufficiently assessed.

For these reasons, I respectfully request that Wiltshire Council refuse planning permission.

Yours faithfully

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