

# **Formal Objection 3 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 serious concerns regarding structural integrity, intensified servicing requirements, impact on the Grade II listed fabric, and the direct and disproportionate effect this proposal would have on my home.

## **1. Intensification of Structural Load and Use**

This property forms part of a historic listed terrace with shared structural walls, floors, roof structure, and foundations. While no external alterations are proposed, the change of use to accommodate five unrelated occupants represents a significant intensification of internal activity and loading compared to a single household.

In practical terms, this intensification will likely result in:

- Increased dynamic loading on shared floors and staircases
- Greater vibration transfer through the party wall
- Increased plumbing usage (multiple showers, sinks, appliances)
- Higher sustained humidity levels affecting historic fabric

Older listed structures were not designed for this level of continuous and intensified use. The application provides no structural assessment to demonstrate that the shared building fabric can accommodate this intensified occupation without harm.

## **2. Fire Safety and Compulsory Internal Alterations**

A five-bedroom HMO typically requires enhanced fire safety measures, including:

- Interlinked fire alarm systems
- Fire panel system

- Fire barriers around external doorways and windows
- Cavity barriers
- Roof fire barriers
- Fire-rated doors and partitions
- Emergency lighting
- Protected escape routes
- Protected staircases

Within a Grade II listed building, such works often require physical alterations to historic doors, frames, ceilings, and walls. Even if not detailed in this submission, these interventions are frequently necessary for compliance with HMO licensing and building regulations.

As an adjoining owner sharing structural elements, I am concerned that:

- Chasing into party walls for wiring or alarm systems may affect structural integrity
- Additional fire compartmentation may alter the breathability of the historic structure
- Incremental works over time will erode the original fabric

The Design and Access Statement does not provide a heritage impact assessment robust enough to address these realities.

### **3. Increased Plumbing and Risk of Water Damage**

An HMO with five unrelated occupants will generate significantly higher water usage than a single household. This increases the risk of:

- Leaks from multiple bathrooms or appliances
- Pipework modifications within shared structural walls
- Long-term moisture penetration affecting the party wall

In historic buildings, moisture transfer through solid walls can result in damp migration into adjoining properties. As a directly affected neighbour, I am particularly concerned about potential water ingress or long-term damp problems arising from intensified plumbing use.

No drainage or services impact assessment has been provided.

### **4. Vibration and Acoustic Transmission**

Older terraced properties typically have limited acoustic separation. Increased occupancy results in:

- Greater footfall
- More door slamming
- Increased stair usage
- Continuous kitchen and bathroom extraction systems

As I share a party wall, this level of intensified occupation will materially increase noise transmission into my home. No acoustic assessment has been submitted to demonstrate that neighbouring amenity can be protected.

## **5. Long-Term Fabric Stress in a Listed Terrace**

The application asserts that there will be “no harm” to the listed nature of the building because no external alterations are proposed. This is an overly narrow interpretation of heritage impact.

Harm to listed buildings can occur through:

- Over-intensification of use
- Incremental internal alterations
- Mechanical and service installations
- Accelerated wear and deterioration

The terrace functions as a unified historic structure. Increased occupation of one unit inevitably affects the wider building of which my home forms part.

## **6. Cumulative and Ongoing Risk**

Once established as an HMO, the use pattern changes permanently. Turnover of tenants, higher occupancy density, and maintenance cycles differ substantially from a family dwelling.

## **7. Lapsed Permission Does Not Override Current Harm**

The lapsed 2020 consent does not remove the obligation to assess the proposal against current conditions and its direct impact on adjoining owners. As the immediately affected neighbour, I bear disproportionate risk from structural, acoustic, and moisture-related impacts that have not been adequately assessed.

Circumstances may have changed, including:

- Local parking pressures
- Housing mix considerations
- Policy updates
- Neighbour amenity expectations

Each application must be assessed on its current merits

## Conclusion

This proposal is not merely an administrative change of use. It represents a material intensification of occupation within a shared Grade II listed terrace as part of a gated community, with direct implications for:

- Structural integrity
- Party wall stability
- Fire safety alterations
- Increased plumbing and moisture risk
- Noise transmission
- Long-term heritage impact

In the absence of detailed structural, acoustic, and heritage assessments addressing these concerns, the application fails to demonstrate that the development will preserve the building's special interest or protect neighbouring amenity.

I therefore respectfully request that Wiltshire Council refuse planning permission for this proposal.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.