

Formal Objection to Planning Application PL/2026/00390

Proposed Change of Use from C3 Dwelling to 5-Bedroom C4 HMO Budbury Place, Bradford on Avon

Dear Development Management

I wish to formally object to planning application PL/2026/00390, which seeks permission to change the use of a four-bedroom Class C3 dwelling to a five-bedroom Class C4 House in Multiple Occupation (HMO).

The proposal represents an over-intensive form of development that would result in inadequate communal living space, a realistic risk of overcrowding (potentially up to eight adult occupants), and material harm to residential amenity and living conditions.

1. Conflict with the Wiltshire Core Strategy (Local Plan)

Core Policy 57 – Ensuring High Quality Design and Place Shaping

Core Policy 57 requires development to create “high quality places” and ensure proposals:

- Make a positive contribution to the character of the area; and
- Provide appropriate levels of amenity for future occupants.

The proposed layout fails to meet these requirements:

- The shared kitchen/dining area is limited in size relative to the number of bedrooms and likely occupants.
- There is no dedicated living room, significantly reducing functional communal space.
- The intensification from a family dwelling to a five-bedroom HMO creates the realistic potential for multiple adults per room, leading to substandard internal living conditions.

Taken together, the internal layout does not demonstrate that appropriate levels of amenity would be secured for future occupants, contrary to Policy 57.

Core Policy 46 – Meeting the Needs of Wiltshire’s Vulnerable People

While HMOs can contribute to housing supply, Policy 46 requires accommodation to be appropriate, safe, and not overcrowded.

This proposal fails that test because:

- The communal facilities appear undersized for the likely number of residents.

- The absence of meaningful shared living space reduces opportunities for safe, comfortable shared occupation.
- The proposal raises legitimate concerns under the Housing Act 2004 in relation to overcrowding and suitability for occupation.

Provision of accommodation must not come at the expense of acceptable living standards.

Core Policy 2 – Delivery Strategy

Wiltshire Council’s spatial strategy seeks sustainable development appropriate to the scale and character of settlements.

Bradford on Avon is a constrained historic settlement with limited capacity for intensification. The change from a single household to a high-occupancy HMO represents overdevelopment of a modest dwelling within a quiet residential cul-de-sac.

This form of intensification would place additional pressure on:

- On-street parking provision
- Local services
- The established residential character and community balance of Budbury Place

2. National Planning Policy Framework (NPPF)

Paragraph 130(f) of the NPPF requires development to create places with a “high standard of amenity for existing and future users.”

The proposed arrangement fails to demonstrate how acceptable internal living conditions would be achieved for up to eight adults sharing limited facilities. The likely outcome is cramped, functionally inadequate communal space, undermining both resident wellbeing and neighbouring amenity.

3. Nationally Described Space Standards (NDSS)

Although not mandatory, the Nationally Described Space Standards are routinely used by Wiltshire Council as a benchmark for assessing internal amenity.

A five-bedroom HMO accommodating up to eight adults requires proportionate communal space to allow:

- Safe and practical food preparation
- Adequate dining facilities
- Everyday shared living activity

The proposed shared areas fall significantly short of what would reasonably be expected for this level of occupancy.

4. Impact on Residential Amenity

The intensification of use is likely to result in:

- Increased noise and disturbance from multiple unrelated adults
- Greater comings and goings, including late evenings and early mornings
- Increased on-street parking pressure in an already constrained residential setting

These impacts would materially harm the amenity of neighbouring occupiers and erode the settled character of the cul-de-sac.

5. Lack of Demonstrated Need

The application does not demonstrate:

- A specific localised need for additional HMO accommodation in this location;
- How the proposal supports Bradford on Avon's housing mix and community balance;
- Why a family dwelling should be lost in favour of intensified multi-occupation use.

Without such justification, the proposal risks incremental erosion of family housing stock and the established residential character of the area.

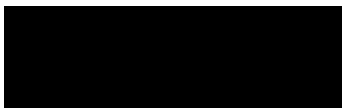
Conclusion

The proposal represents an over-intensive and inappropriate use of a modest residential dwelling, with insufficient communal space, a high likelihood of overcrowding, and clear conflict with:

- Wiltshire Core Strategy Policies 57, 46 and 2; and
- The amenity principles of the NPPF.

For the reasons set out above, I respectfully request that planning permission for application PL/2026/00390 be refused.

Yours faithfully

A solid black rectangular box used to redact the signature and name of the official.