

Formal Objection to Highways Department Response

Planning Application: **PL/2026/00390**

Proposal: Change of use from C3 (4-bed family dwelling) to C4 (5-bed House in Multiple Occupation)

I write to formally object to the Highways Department's response stating that there is "*no highway objection*" on the basis that the number of bedrooms and parking provision are the same as in application 20/09524/FUL. I submit that this conclusion fails to properly consider key highways and parking policies and the practical impacts of the proposed change of use.

1. Intensification of Occupancy and Transport Impact

The change from a single-household dwelling (C3) to a 5-bed HMO (C4) represents a **material change in the use of the property** that typically generates significantly more vehicle movements, visitor trips, and delivery activity. HMOs, by their nature, house unrelated individuals with independent travel patterns, which creates *higher trip generation* than a single-family home. This increased intensity is not adequately acknowledged by simply equating the number of bedrooms with a household dwelling.

2. Local Parking and Highway Conditions

The Local Transport Plan and Parking Strategy documents produced by Wiltshire Council provide context for how parking should reflect local needs, safety, and sustainable transport considerations. Although these documents (such as the *Wiltshire Parking Strategy* and *Local Transport Plan*) do not prescribe rigid maximum residential parking standards, they do emphasise the importance of ensuring that developments do not transfer *unmet parking demand onto residential streets*, which can result in *streetscene problems and safety issues*, particularly where parking is oversubscribed.

In rural or suburban areas such as that surrounding this site, Wiltshire's own strategy acknowledges that adequate and *locally appropriate residential parking provision* is essential to avoid spill-over onto the public highway, which can impede visibility at junctions and obstruct access for larger vehicles, including emergency services.

3. Parking Provision for HMOs

While the Highways Department refers to the previous application's stance, there is *no clear demonstration* that the proposed parking provision is sufficient to serve a 5-bed HMO. Houses in Multiple Occupation often require different parking consideration than conventional family homes because:

- They can generate **multiple independently owned vehicles** and additional visitors.
- On-site parking can fill quickly, pushing further demand onto *on-street spaces*.
- Wiltshire's Car Parking Strategy recommends sensitivity to *local circumstances*, including high parking demand, on-street pressure, and highway safety implications.

Even if formal minimum parking standards are not rigidly set, the **principle that residential developments should be designed to minimise on-street parking pressures and road safety hazards** is embedded within the Council's transport policies. This principle applies equally to HMOs as to other residential developments.

4. Cumulative Impacts and Precedent

Granting consent on the basis that a previous application was not objected to does not address *changes in local conditions* or the cumulative effect of multiple HMOs and conversions in the area. Repeated approvals without rigorous review of parking and transport impacts can lead to a material deterioration in local conditions, contrary to the Council's own strategic objectives to manage parking demand and support sustainable transport.

5. Highway Safety and Accessibility

Increased HMO occupation places additional stress on on-street parking, which in turn increases the likelihood of vehicles parking in suboptimal locations (e.g., near junctions or on pavements), restricting visibility for drivers and pedestrians. This risk is acknowledged within Wiltshire's parking strategy as a potential *safety concern* where parking overspill is generated by residential developments.

Conclusion

For the reasons outlined above, the Highways Department's conclusion of "no objection" on the basis that the number of bedrooms and parking spaces remains unchanged is **not sufficiently justified**. It fails to adequately account for:

- The *intensification of use* associated with HMOs;
- The *parking and safety implications* in local conditions;
- The relevant policy framework in Wiltshire's own parking and transport strategies; and
- The potential *cumulative impacts on highway safety and parking stress* in the area.

In the absence of a robust highways and parking impact assessment, including proper consideration of on-street parking capacity, vehicle movements, and compliance with the Council's local parking and transport objectives, I respectfully request that the application be refused.

Yours faithfully

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