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PS

Design & Access/ Planning Statement

50 Whitehill Road, Gravesend, Kent, DA12 5PG

Image by Freepik

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Introduction

1. This design and access/planning statement supports a planning application submitted by CJ Rentals Ltd [*'the applicant'*] for the change of use of 50 Whitehill Road, Gravesend, Kent, DA12 5PG [*'the property'*] from a small house in multiple occupation [*'HMO'*] (Use Class C4) to an 8 bedroom, 8-person, large HMO (sui generis) [*'the proposal'*].
2. It is intended to let the property to professionals or young professionals with access to their workplace from the property.
3. No external alterations or extensions to the building envelope are required to facilitate the use change.

Planning History

4. The Council has issued a Certificate of Proposed Lawful Use or Development, reference 20250220, for the use of the property as a small HMO and for the erection of a rear extension and additions to the roof. That development has been implemented. The property benefits from an HMO license for accommodating **6** people.

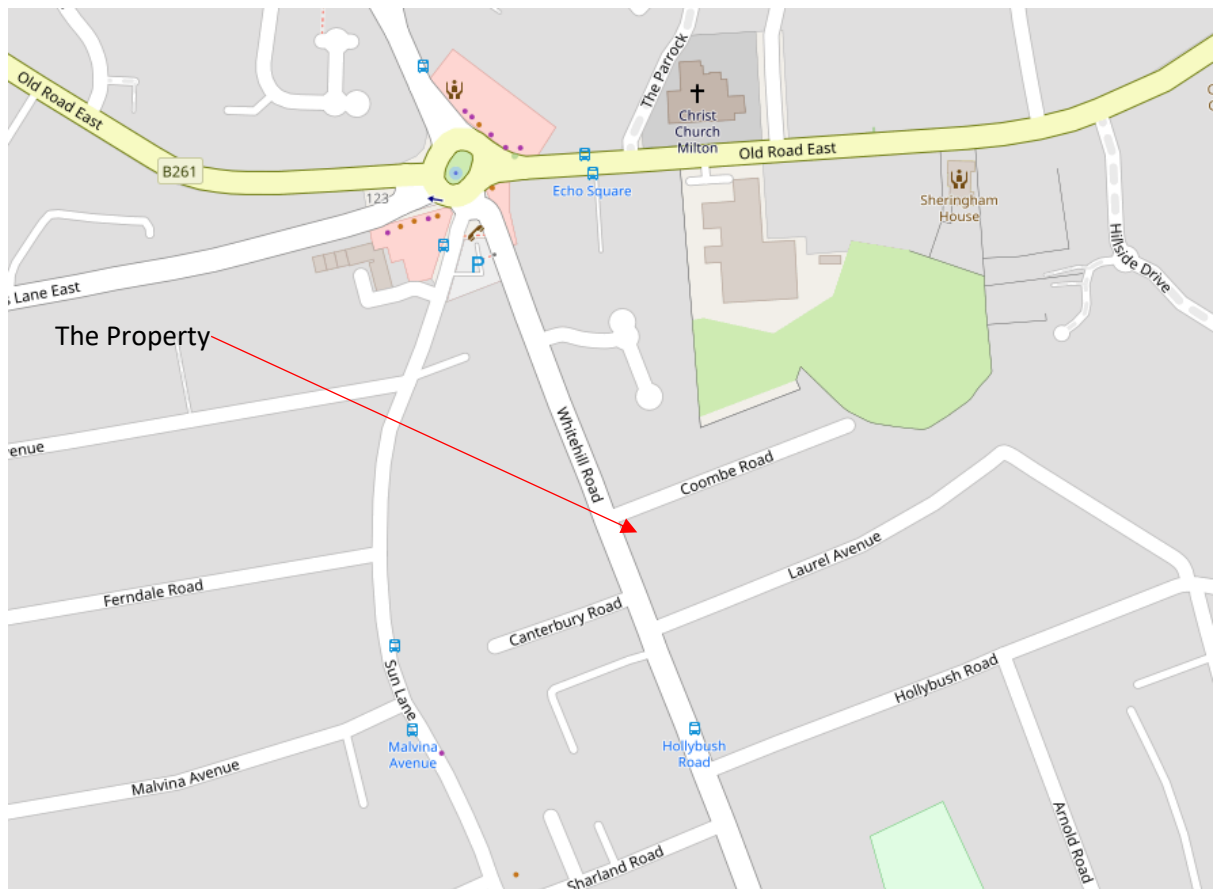


Fig.1 - Mapping - The property in its wider setting (Source: OpenStreetMap)

Location

5. The property is on the east side of the street, south of the junction of Coombe Road. It is in a predominantly residential area that is not a Conservation Area.
6. The property is located within 6 km of the Thames Estuary and Marshes Special Protection Area ['SPA'].
7. It is situated in a sustainable location, with access to bus stops located on Whitehill Road itself and on Old Road East to the north.
8. It is also accessible to everyday services, facilities and employment opportunities by walking and cycling. Gravesend Train Station is only one mile away and can be reached by bus in 14 minutes, including the walk to the bus stop.



Fig.2 – Satellite Imagery - The property in its environs (source: Google Maps)

Access

9. There is pedestrian and vehicular access to the property from Whitehill Road. However, the property has no in-curtilage parking provision. There is gated pedestrian access via footpath from Comme Road to the rear of the property.

10. The property is situated in a sustainable location, accessible to everyday services, facilities, and employment opportunities on foot and by bicycle, as well as to broader areas with public transport services.
11. The nearest bus stops are on Whitehill Road itself.



Fig.3 – Satellite Imagery - The property in its environs (source: Google Maps)

The Property

12. The property is a two-storey, mid-terrace building with a tiled roof and brick chimney.
13. The property has two bays. The left bay features the main entrance, which has a window above, and the right bay includes a two-storey hipped-roofed bay window.
14. There are gardens to the front and rear of the property.
15. The property has six bedrooms, and the accommodation is spread across three floors: the ground floor, first floor and loft space.
16. Internally, the property features a hallway that provides access to two en-suite bedrooms, stairs to the upper floors and a communal area comprising a combined kitchen/diner and lounge to the rear of the property within the offshoot.
17. The first-floor landing provides access to three en-suite bedrooms and stairs to the loft space, where there is a further en-suite bedroom, a separate shower room and a study.

Key Views

18. The principal public vantage points of the property are from Whitehills Road itself, Coombe Road to the north, and there are oblique views from the junction of the road and Canterbury Street to the south.

The Development Plan

19. Section 38(6) of the Planning and Compulsory Purchase Act 2004 is the starting point for considering planning applications. It confirms that applications for planning permission are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
20. This statement will evaluate the consistency of the proposed development with the relevant planning policies of the Development Plan, national policy contained within the National Planning Policy Framework [*the Framework*] and other material considerations.
21. The Framework states that its policies are material considerations that should be taken into account when dealing with applications from the date of its publication.
22. Plans may need to be revised to reflect the policy changes in the replacement Framework. Revisions should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.



Fig.4 - Image - The principal elevation of the property (Source: Google Maps)

23. In this case, the development plan for the Gravesham Borough Council comprises the Gravesham Local Plan Core Strategy 2014 ['CS'] and the saved policies of the Gravesham Local Plan, First Review 1994 ['LP'].
24. The Council is also preparing the new Local Plan for Gravesham Borough Council and, as of September 2025, it is undertaking a partial review of its Local Plan Core Strategy and preparing a new Site Allocations and Development Management Policies Document.
25. Until the adoption of the new plan, planning decisions continue to be made based on the 2014 Core Strategy, saved 1994 policies, and the Kent Minerals and Waste Local Plan (2024–30).

Core Strategy

26. The Core Strategy was adopted in 2014. The policies of the CS relevant to the consideration of the proposal are:
 - CS01 – Sustainable Development
 - CS02 – Scale & Distribution of Development
 - CS11 – Transport
 - CS14 – Housing Types and Sizes
 - CS15 – Housing Density
 - CS18 – Climate Change
 - CS19 – Development & Design Principles

Local Plan

- H5 – Increasing the Housing Stock by the Conversion of Existing Buildings
 - H6(iii) – Provision to Meet Special Housing Needs
 - T1 – Impact of Development on the Highway Network
 - P3 – Vehicle Parking Standards
27. There are no CS or LP policies specific to HMO development proposals.

Supplementary Planning Documents

28. While not part of the statutory Development Plan, Supplementary Planning Documents ['SPDs'] provide additional guidance on implementing policies. They cover site-specific developments like design standards and environmental considerations.

29. The Council's planning framework includes SPDs on topics such as Residential Layout Guidelines, Parking Standards, the Nationally Described Space Standards, Householder Extensions/Alterations Design Guide and a Design Code.
30. However, it is essential to note that the Council does not have a specific SPD to guide HMO development proposals.

Assessment

31. The applicant contends that the **principal** planning considerations are the following:
 - Principle of the Development
 - Residential Amenities of Neighbours
 - Residential Amenities of End Users
 - Car Parking and Accessibility
 - Character of the Area and Dwelling
 - Biodiversity Net Gain
 - Special Protection Area and SAMMS
32. Each will be addressed in turn.

The Principle of Development

33. Policy CS14, *Housing Type and Size*, of the CS seeks to protect the mix of housing in the existing stock and to restrict the conversion of family-sized properties into smaller properties.
34. Its commentary defines family homes as homes with two or more bedrooms. It also states that new housing development should provide a range of dwelling types and sizes, taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.
35. Following the granting of a Certificate of Proposed Lawful Use or Development, reference 20250220, the property has been converted to a small HMO. Facilitating this permitted change of use was the erection of a rear extension and additions to the roof, and this development was also deemed to be permitted development.
36. As detailed above, the HMO has six bedrooms. The use has already commenced, and the operational development has been completed.

37. Accordingly, it is the intensification of use by the creation of two new bedrooms accommodating two additional occupants that falls to be considered in this application.

Shortage of Housing

38. As of September 2025, Gravesham Borough Council cannot demonstrate a five-year housing land supply against its local housing need, as calculated using the Government's standard method and with the updated National Planning Policy Framework's [*NPPFs*] requirements. In planning terms, this means decision-makers should apply the Framework's '*tilted balance*', with the shortfall in housing supply a significant material consideration for new housing proposals.
39. Given the national housing crisis and there being identified shortage of local housing, it is not unreasonable to suggest there will be a demonstrable and growing need for HMO bedspaces to provide a low-cost housing solution.
40. The applicant contends that in increasing the occupancy of an existing HMO, the proposal will add to the available accommodation in Gravesham and would be in line with Policy CS14.
41. Of course, the intensification of the use of the property must not come at the expense of the environment or the residential amenities of existing residents, and this statement will demonstrate how these can be preserved.
42. The applicant contends that the principle of the proposal is acceptable.

The Residential Amenities of Neighbours

43. Before we consider this issue in detail, it is essential to consider the existing lawful use as a baseline against which the proposal can be evaluated.

The Existing Small Use and Lack of Controls

44. The Council does not have an Article 4 Direction that would remove the permitted development rights conveyed by the General Permitted Development Order, which would allow the change of use of the property from a Class C3 family home to a Class 4 HMO. Hence, the Council was able to issue the Certificate of Proposed Lawful Use or Development, reference 20250220.

45. There are no conditions and limitations of Schedule 2, Part 3, Class L of the GPDO that seek to preserve the residential amenities of neighbours. It takes it for granted that, from a planning perspective, the small HMO use would not adversely impact the residential amenities of neighbours. As we know, a Class C4 HMO can accommodate up to six people.
46. So, it is this level of use, unfettered by planning controls, that forms the baseline against which the proposal should be considered. This statement will demonstrate that, through the controls advocated by the applicant, it is highly likely that the residential amenities of neighbours can be improved through this proposal.
47. The Local Plan, lacking specific HMO policies and supplementary planning guidance, offers limited guidance on how to preserve the residential amenities of neighbours in relation to such development.

CS19, Development and Design Principles

48. Policy CS19 seeks to do an awful lot of things, including safeguarding the amenities of neighbours from adverse environmental impacts, including noise. It guides development rather than being specifically permissive or restrictive of development proposals. It does not, for example, state that development will be permissible only if its criteria are met, or, in contrast, would restrict development that conflicted with its criteria. It takes more of a 'new development will...' approach.
49. It also seeks to safeguard neighbours' privacy, daylight and sunlight, impacts that would not arise from the proposal because no changes to the building envelope are proposed.

Proposed Change of Use

50. The property is already in residential use. Again, here we are considering the impacts of an additional **two** people from the lawful Class C4 HMO existing position.
51. The proposed HMO will accommodate **8** people, each with a single-occupancy bedroom. It is not considered that this scale of residential use would significantly impact the residential amenity of neighbouring properties in terms of increased noise and disturbance, provided the measures and controls advocated by the applicant are, or have been, implemented.

The Building Regulations

53. The applicant would point out that Part E of the Building Regulations does not relate to changing use from a single-family residence to a small HMO. So, Part E did not apply in undertaking the change of use to a small HMO. Nor would they apply to the proposal to change the property into sui generis use.
54. However, there is no reason why the property should not be attenuated if the building fabric fails to meet the requirements of the Building Regulations.
55. The Framework advises that planning policies and decisions should focus on whether the proposed development is an acceptable land use. Policies should not focus on controlling processes or emissions where these are subject to separate pollution control regimes. Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.
56. The Building Regulations are not intended to eliminate noise altogether, but ensure a minimum airborne sound resistance for dividing walls and floors between homes.
57. The Regulations would secure a minimum level of airborne sound resistance of **43** dB for conversions to a home. This would easily eliminate normal levels of speech, TV, and amplified music playing. For impact sounds, such as footsteps, jumping, and dropped objects, a maximum impact sound transmittance level of **64** dB is specified for floors and stairs in conversion projects.
58. Developers can conduct an on-site sound test on dividing walls between homes **or** follow a robust set of Standard Details.
59. Compliance with the Building Regulations ensures that the property will meet the minimum airborne and impact sound resistance levels.
60. Therefore, the applicant would welcome a condition of planning permission to secure attenuation, if necessary, equal to the resistance levels specified in the Building Regulations. However, please note that it is often the case that the existing building fabric already affords noise attenuation to acceptable levels. After all, the property is already in residential use.
61. In conclusion, subject to any necessary sound attenuation secured as a condition of planning permission, the proposal will protect the residential amenities of neighbouring properties from unacceptable noise and disturbance generated from within the property.
62. The potential for noise and disturbance generated by occupants outside of the property can be appropriately addressed through a property management plan [*PMP*] secured by a condition of planning approval.

Property Management Plan

63. The applicant will take measures to minimise the potential for their tenants to cause anti-social behaviour, noise and disturbance. If such occurrences occur, neighbouring properties can report them. They can establish procedures in a property management plan secured through a condition of planning permission.
64. A property management plan will enhance the quality of development. Again, such plans are often secured for purpose-built student accommodation. There is no reason why they cannot be proportionately used for smaller-scale HMO developments.
65. Government guidance (Ministry of Housing, Communities and Local Government, 2019) is that conditions should be tailored to tackle specific problems rather than standardised or used to impose broad, unnecessary controls. Here is one instance where a condition can be tailored to mitigate any adverse effects of the development.
66. The applicant considers that securing a property management plan would meet the necessary test to safeguard the residential amenities of neighbouring properties.
67. Such a property management plan would be relevant to controlling the property's proposed use and, therefore, is relevant to planning. It would not be ultra vires.
68. The Council could enforce the condition if the appellant or successors in the title do not adhere to the property management plan. The condition would prevent harm to the area's amenities resulting from the development.
69. It would not be difficult to monitor, as those affected by a contravention of the condition's requirements are highly likely to be able to provide clear evidence of any breaches. Accordingly, the condition would be practically enforceable.
70. The condition may require the applicant to implement a property management plan before commencing use, as per a written plan approved by the local planning authority. If the applicant is not adhering to the plan, the Council can enforce compliance with the condition. Accordingly, a carefully worded condition can be precise.
71. The applicant considers such a condition perfectly reasonable. They will gladly work with the Council to secure an appropriate property management plan, providing the Council and its neighbours with assurances.
72. The applicant contends that by securing any necessary noise attenuation and a property management plan, their proposal would not conflict with Policy CS19, and the residential amenities of neighbours would be preserved.

73. In fact, approval of the planning application will enable controls above and beyond those that could be applied to the existing small HMO use of the property. In this respect, the residential amenities of neighbours could be improved.
74. So far, we have principally addressed the potential impacts of the proposals on neighbours' residential amenities in terms of noise and disturbance. Yet, it is nationally recognised that concentrations of historic, uncontrolled HMOs can impact neighbours' residential amenities and can, in some cases, create particular issues concerning:
- increased levels of crime and the fear of crime;
 - poorer standards of property maintenance and repair;
 - littering and accumulation of rubbish;
 - decreased demand for some local services
 - lack of community integration and less commitment to maintaining the quality of the local environment
 - car parking pressure
75. For a more rounded approach, this statement will consider each potential harm in turn. The applicant is confident that the residential amenities of neighbours can be preserved, if not improved, when considered against the existing, lawful, uncontrolled, Class C4 HMO use of the property.

Crime and Fear of Crime

76. Councils often claim that high proportions of HMO-let properties can lead to increased crime and a higher fear of crime. Policy CS19 states that the layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.
77. The Police Crime Reports (Police.UK, n.d.) for the area, summarised in **Appendix 1** of this statement, have been considered. Obtaining monthly snapshots of reported crimes in the vicinity of the property is possible.
78. Between August 2024 and July 2025, there were **2** Anti-social Behaviour ['ASB'] crimes reported near the property. This equates to a report of ASB Crime on average every **183** days. It is not possible to identify the exact source of the ASBs from the police crime maps. Yet, the Police statistics confirm there should be no significant concerns about anti-social behaviour or fear of crime in the locality.
79. It is considered that the mitigation measures outlined in this statement would ensure that there is no increase in ASB crime in the vicinity.

80. The property would benefit from natural surveillance from surrounding properties, many of which are in single-family use. A professionally fitted security system will deter burglary if the property is empty and there is no reason to believe the accommodation would not meet reasonable security expectations.

Property Maintenance

81. As will be evidenced by the officer's site visit, the property is in a good state of repair. Since acquiring the property, the applicant has refurbished the front of the property, painting the façade white with black quoin detail. They have reroofed the property.
82. The applicant has policies in place to ensure that their tenants will maintain the property's cleanliness and tidiness, both inside and outside.
83. There are guidelines for reporting repairs and maintenance issues, as well as rubbish collection and storage. Annual maintenance and repairs of its buildings and gardens are carried out before any new tenancies are commenced.

Littering and Flyposting

84. The applicant is pleased to note there is no evidence of fly posting or an accumulation of waste in the vicinity of the property that the Council can attribute to the concentration of HMO properties.
85. Securing an adequate refuse and recycling storage scheme will ensure that waste does not overflow into the community, causing a littering problem.
86. Accordingly, there would not be a demonstrable increase in littering or flyposting as a result of the proposal.

Local Services

87. Councils will often cite that high concentrations of HMOs can decrease demand for some local services. Working within the administrative boundaries of many Councils, the author has yet to see any tangible evidence that the demise of any local services can be wholly attributed to HMO development.
88. The National HMO Lobby's *Balanced Communities and Studentification: Problems and Solutions* (Lobby, 2008) can often help Councils set their arbitrary HMO concentration thresholds when drafting new HMO policies. It cites decreased demand for school places as a possible negative impact of high concentrations of HMOs.
89. Whatever the case here, it is not considered that the slight intensification of the existing use would have a demonstrable adverse impact on local services.

Community Integration

90. The property will be attractive to young professionals and those of low income. These individuals may have family in the community. They will contribute to it, just like any other family member with whom they share much in common.
91. There are many sub-communities within a community, and most people will belong to and contribute to several at once. However, contribution to the community is not limited to non-students.
92. In the future, the end users could, conceivably, be students. Students will contribute, too. There's no reason why a student would not contribute to the local community, sharing a common concern for the neighbourhood where they reside. There will be a contribution to the vocational community through shared goals with the academic community.
93. Students share many community services and facilities with non-students and contribute significantly to the community's life and vitality.
94. They also make a significant economic contribution to the community. However, given the transient nature of students, it is accepted that an individual student will contribute less to a community, considering the limited time they typically reside there (2 to 3 years).
95. However, let us not lose sight of the fact that a student will likely be replaced by another student in the following academic year. Accordingly, suggesting a student does not integrate with the community would be wrong. If the property were occupied by students, it would still contribute to the community's health.
96. Times have changed, and it should not be automatically assumed that an HMO will produce adverse impacts, as some uncontrolled HMOs of the past did.

Letting Signs

97. The application site visit should demonstrate no evidence of the proliferation of letting signs near the property. However, it is perfectly legal, in accordance with the regulations, for a letting board to be displayed at the property to solicit prospective tenants and remove them once tenancies are secured. This would be true whether the property was let to a family or as an HMO.

Anti-social behaviour

98. Occupants of HMOs need not be students, although when they are, Universities usually have strict policies to address misconduct inside and, most importantly, outside the University. Universities have the power to suspend or permanently exclude students from the University.

99. Out with the applicant's powers as the landlord, the Council, the police, and Universities have tools available to them to reduce the potential for HMO tenants to cause anti-social behaviour and to deal with any problems that may arise expeditiously.
100. However, one should not presume that it is HMO tenants, particularly students, who are responsible for anti-social behaviour in the community. **By way of example only**, in recent HMO planning appeals, Charnwood Borough Council referred to its Houses in Multiple Occupation Assessment (2019) (RRR Consultancy for Charnwood Borough Council, 2019) in its defence of the decision to refuse HMO development.
101. However, a closer examination of the document revealed that it did not support the Council's assertion that HMOs have a greater propensity to cause noise and disturbance than a family home. In paragraph 3.9 of the study, it is stated:
- 'Interestingly, it shows that over four fifths (83%) of noise incidents took place in single family houses with the second most incidents (11%) taking place in purpose-built flats. In contrast, only small proportions of noise incidents took place in bedsits/HMOs (4%).'*
102. And in paragraph 3.10, it is stated:
- 'Table 3.8 shows the number of HMOs in each ward compared to the number of noise incidents recorded in each ward between January 2013 and December 2018. Undertaking a statistical correlation on the two columns i.e. undertaking a statistics test to determine the relationship between the two columns produces a measure of 0.34. Unlike the relationship between the number of HMOs and ASB, a value of 0.34 indicates a weak positive relationship between the two columns i.e. **as the number of HMOs in any particular ward increases, the number of noise incidents increases only slightly.***
103. And in the Summary, paragraph 3.17, it is stated:
- 'Although noise nuisance is an issue commonly associated with areas containing large proportions of HMOs, evidence suggests that there is only a weak correlation between the two factors. Data shows that most recorded noise incidents took place in single family houses, with only small proportions taking place in bedsits or HMOs.'*
104. These will have been astonishing outcomes for some to see, particularly those proponents who theorise that HMOs can be blamed for anything. If Gravesham BC were to undertake a similar investigation, it may well have similar findings.

105. Notwithstanding this, it would be disingenuous for the applicant to guarantee that future residents would not engage in anti-social behaviour. As the discussion above demonstrates, students and others in HMO accommodation are not the sole arbiters of anti-social behaviour. Any occupier of any property could cause concerns in a community. That is why the controls advocated by the applicant above are important.

Conclusion (on the residential amenity of neighbours)

106. Any required noise attenuation scheme, a PMP, and the powers of other stakeholders will reduce the potential for neighbours' residential amenities to be harmed by noise, disturbance, and anti-social behaviour.
107. If any problems were to occur, procedures and controls would be in place to ensure that all stakeholders, including the applicant, could deal with them effectively and efficiently.
108. The applicant contends that the neighbour's residential amenities can be preserved, if not improved, through this proposal. The controls advocated by the applicant in this statement cannot be imposed by the Council on the existing Class C4 HMO use. Neighbours would be in a better position and have greater assurances if this application were approved.

Operational Development

109. Above, we have considered the impacts of the proposal that could affect the residential amenities of neighbours through the proposed change of use.
110. Where extensions and external alterations are proposed to facilitate this change of use, these operational developments would normally be assessed to determine whether they would impact the residential amenities of neighbours by way of a loss of privacy, outlook, or light.
111. However, in this case, the operational developments that help facilitate the use change have already been undertaken as permitted development, and the Council has no control over them.
112. Consequently, the applicant contends that the proposal will not adversely impact the residential amenities of neighbours through loss of outlook, light or privacy, and there is no conflict with Policy CS19 in this respect.

The Residential Amenities of End Users

The National Picture

Nationally Described Space Standards

113. Footnote 54 of the Framework states:

'Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.'

114. So, extant and emerging policies may relate to the Nationally Described Space Standards.
115. The NDSS require that a single-occupancy bedroom have a floor area of at least **7.5m²**. Any double occupancy bedroom must have a floor area of at least **11.5m²**.
116. Single bedrooms should have a width of at least **2.15m** and double occupancy bedrooms **2.75m**, with every other double or twin bedroom at least **2.55m** wide.
117. Each proposed bedroom will be a single-occupancy room, regardless of whether they are large enough for double occupancy in accordance with the NDSS. So, they all comply with these standards.
118. The NDSS do not dictate the required floor areas for communal rooms, including living and dining rooms and kitchens. Instead, they refer to the Gross Internal Area [**GIA**].
119. Table 1 provides the Minimum Gross Internal Floor Areas and Storage. Storage is included in the GIA.
120. The requirements are based on the number of storeys of the property, the number of bedrooms and the number of persons occupied.
121. The NDSS only provide guidance up to **6** bedrooms. However, a **6**-bedroom, **8**-person, three-storey dwelling should have a minimum GIA of **138m²**. The property has a GIA of **142.7m²**, exceeding this requirement.
122. And so, the proposal would comply with the NDSS if applied.

National Minimum Room Sizes for Licensed HMOs

123. All licensable HMOs must comply with the Management of Houses in Multiple Occupation (England) Regulations 2006 and the national minimum room sizes as set out in the Housing Act 2004.

124. From 1 October 2018, HMOs licensed in England under Part 2 of the Housing Act 2004 are required to contain a condition relating to minimum room sizes. These conditions must ensure that the floor area of any room used as sleeping accommodation is not -
- less than **6.51** square metres if it is used as sleeping accommodation by one person aged over 10 years old
 - less than **10.22** square metres if it is used as sleeping accommodation by two people aged over 10 years old
 - less than **4.64** square metres if it is used as sleeping accommodation by one person aged under 10 years
 - less than **4.64** square metres in any situation where it is used as sleeping accommodation.
125. As we shall see, the local space standards reflect the National Minimum Room Sizes for bedrooms.

The Local Picture on Space Standards

126. When considering the residential amenity of end users, we can also turn our attention to Policy CS19, which states that the design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines. It also requires, in general terms, that new development will provide appropriate levels of amenity space.
127. The Council refers¹ to its 'adopted' Residential Layout Guidelines in this policy.
128. These were adopted way back in 1996 as Supplementary Planning Guidance, to ensure that housing layouts, room sizes, internal arrangements and amenity space meet a minimum standard.
129. The commentary of Policy CS19 states², all new residential accommodation, including conversions, will '*normally*', suggesting some flexibility, be required to conform to the space standards set out in the '*current*' SPG. It is expected that the minimum internal floorspace standards will be exceeded to create good quality accommodation and to ensure future adaptability of the dwelling.
130. The current Residential Layout Guidelines, including the Housing Standards Policy Statement, October 2015, is SPG2, amended in June 2020. It refers to Policy CS19 and the Nationally Described Space Standards introduced in 2015.

¹ Main bullet point 4.

² Paragraph 5.15.12

131. The SPG states:

Therefore, for Gravesham, Local Plan Core Strategy policies...and CS19 Development and Design Principles and associated guidance in the Residential Layout Guidelines Supplementary Planning Guidance (SPG), should be interpreted by reference to the nearest equivalent new national technical standard. This is set out in Table 1.

132. The SPG acknowledges it is difficult to draw direct comparisons between the existing Gravesham Residential Layout Guidelines SPG and the proposed National Space Standard because they are calculated on a slightly different basis.
133. The existing Gravesham standards are based on guideline minimum spaces for each room. In contrast, the National Space Standard relates to the minimum gross internal area ['GIA'] of the overall unit to the design level of occupancy based on bedroom size and the potential number of bed spaces that could be accommodated.
134. The SPG states the Council will consider whether to adopt the new national technical standards, in their entirety, through the Site Allocations and Development Management Policies Development Plan Document.
135. Detailed guidance on how to apply the SPG is given in Table 1 of the Housing Standards Policy Statement – From 1 October 2015, included in SPG2. In relation to LP Policy H5, it states that in considering proposals that include HMOs ('multiple occupancy'), the former standard was that the proposal shall have regard to the Borough's Residential Layout Guidelines, as set out in supplementary planning guidance.
136. However, from October 2015, the table tells us the proposal shall have regard to the Borough's Residential Layout Guidelines where they fall within the nationally described space standards. So, it is clear that the NDSS take precedence and the Residential Layout Guidelines should only apply where there is no conflict with the NDSS. We have already deduced that the two are incompatible.
137. The table also refers to Tables 1 and 3 of the Residential Layout Guidelines SPG that follows. It states that Tables 1 and 3, setting out room sizes, will no longer apply because they are less than the NDSS standard. **This is crucially important.**

The minimum floorspaces for double bedrooms and single bedrooms will no longer apply as at 11.2 sq m and 6.5 sq m respectively, these are less than the nationally described space standards of 11.5 sq m and 7.5 sq m.

The minimum floorspaces for living rooms, dining rooms, kitchens, kitchen/diners, lounge/diners, bathrooms and WCs, bathrooms only, WCs only, bedsits, and hallways & landings will no longer apply as there is not an equivalent national standard. Table 1 applies to new dwellinghouses and extensions to dwellinghouses.

138. Table 3 applies to flats, maisonettes and bed-sitters. So, neither table guides HMO development proposals. In reality, the SPG offers no guidance on space standards for the proposal. The only mention of HMOs is in Table 1 of the Housing Standards Policy Statement at the beginning of the SPG, which really serves as an introduction.
139. Again, that refers to LP Policy H5 and, in turn, to the Residential Layout Guidelines only where these fall, in other words, comply with the NDSS. And so, it is fair to say the SPG and the RLG within it are pretty useless in relation to HMO development proposals.
140. Nor does the SPG state that the NDSS should be used for guiding HMO development proposals. It states **the proposal shall have regard to the Borough's Residential Layout Guidelines** where the Guidelines fall within the nationally described space standards. And, we know they do not.
141. In conclusion, Policy CS19, SPG2 and the residential layout guidelines within do not guide space standards for HMOs.
142. It is now evident to the author why, in reading delegated reports on similar developments, different officers have different interpretations of what space standards apply to HMOs.
143. It is evident, probably as a result of the inadequacy of the SPG, that officers seem to rely upon the Council's Guidance for HMO Amenity Standards to inform HMO proposals. Yet, it is arguable that these, too, cannot be applied because there is no evident planning policy link to them. This must, at least, reduce their weight in the planning balance.
144. In essence, the Development Plan is devoid of space standards that can be applied to HMO development proposals.

Guidance for HMO Amenity Standards

145. The current version of the HMO Amenity Standards ['AS'] is V2, published in 2023. They principally guide the HMO licensing regime. They reflect the national minimum requirements and do not, for instance, require as much floor space for bedrooms as the NDSS.

146. But what part do these play and how may they be applied in the planning system? The author has checked the Council's website in relation to supplementary planning documents and informal guidance.

147. It states:

Policies are supported by our adopted Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD). These are material considerations that provide more detailed advice on policies in the Local Plan and are used to help when making decisions on planning applications.

We also provide informal guidance, which we advise you to follow when planning developments and submitting a planning application.

148. Nowhere on the website page are the amenity standards referenced. It is neither a listed SPD, SPG, nor even an informal guide.

149. In fact, the author can find no reference to the lawful application of the amenity standards in the planning system to guide the consideration of HMO Development applications.

150. It is clear. The amenity standards are intended primarily as a housing quality and licensing framework rather than a direct part of planning law. Accordingly, the standards may support but do not supersede planning controls. **This is crucially important to the following assessment.**

151. So, what would the amenity standards require?

152. All proposed bedrooms are single occupancy, and the table on Page 2 of the AS tells us the minimum floor area should be **6.51m²**. All of the bedrooms have floor areas that exceed this requirement.

153. All bedrooms have a window that provides natural light and ventilation.

154. En-suite shower rooms are discounted from the provided bedroom floor areas.

Kitchen and Dining Room Size Requirements

155. The AS states that an HMO accommodating **7-10** occupants should have a communal kitchen of a minimum of **11m²**.

156. A dining area of **2m²** per person is required, which in this case equates to an area of **16m²**.

157. So, in this case, a combined kitchen/dining room of **27m²** is guided.

Living Room Space Requirements

158. The AS's position on the provision of living room space is far from clear.

159. Firstly, note (iv) states:

*iv) In HMOs **without a shared living space** (emphasis added), additional shared dining space is required close to a shared kitchen that is no more than 1 floor distance from any letting room it serves.*

160. It does not then dictate the amount of additional shared dining space required. Still, here, there is an acknowledgement that it is permissible to have an HMO without a shared living space. This has been echoed by the Council in approving HMO proposals that are devoid of living room space.

161. Then, in section 2.2, the AS states:

The property arrangement is to provide communal living space in addition to any space that is required for shared kitchen and dining facilities.

As a guide, a communal living room, should be at least 13m² for 3 people, plus 1m² for every additional person.

162. This is an apparent contradiction within the AS.

163. No living room space is proposed, and the applicant contends this is acceptable in this particular case, having regard to similar developments where the absence of a living room has not prevented the Council from granting planning permission.

164. Accordingly, the applicant contends that end users will have amenity space that does not conflict with the aims and objectives of Policy CS19. That is because there are no space standards tied to it via SPG2. The proposal cannot conflict with something that does not exist.

External Amenity Space

165. Gravesham Borough Council does not set standalone external space (garden or yard) minimums specifically for HMOs in its main planning policies, but its HMO Amenity Standards guidance and general residential layout policies do provide expectations for outside space and facilities.

166. There are no fixed numerical standards for private external space (such as garden area) set out for HMOs in the Council's guidance.

167. Inspectors and the Private Sector Housing Team will expect HMOs to provide 'safe and healthy environments', which usually means some usable outside amenity space is expected if practicable.

168. Bin storage and refuse areas must be provided, and these are considered part of functional external amenity provision for HMOs.

169. National overcrowding criteria and HMO licensing requirements also mean external space is assessed case-by-case for suitability and safety, alongside indoor space.

General Layout Guidelines

- 170. The Council's residential layout guidelines (SPG2) require all dwellings, including HMOs, to have refuse storage and often expect usable amenity space for outdoor activity and drying clothes, but do not define strict size standards for gardens or yards for HMOs.
- 171. Each proposal is assessed individually, and further external space requirements may be conditioned via planning application and licensing on a site-specific basis.

Practical Points

- 172. Planning permissions for HMOs may require a demonstration that outside space is adequate for refuse, cycle storage, and amenity.
- 173. There are no NDSS-style minimums for external amenity space for HMOs in the Gravesham policy.
- 174. In summary, the Council guides HMO external space through its amenity standards and general layout requirements. Still, it does not impose precise quantitative standards for external space, such as gardens or yards for HMOs. Each HMO scheme is judged on its merits, focusing on safe, healthy, and adequate provision.
- 175. In this case, the applicant contends that the proposal provides ample external amenity space for end users to enjoy.

Conclusion (on the Residential Amenities of End Users)

- 176. Gravesham's development plan policies, specifically the Core Strategy (Policy CS19 and CS18), are linked to the NDSS via its SPG2. Still, they do not formally adopt it as a strict requirement—they require interpretation of local standards by reference to the NDSS after 1 October 2015.

Core Strategy Policies Linking to NDSS

- 177. Policy CS18, *Climate Change*, and CS19, *Development and Design Principles*, require all development to be 'fit for purpose' and 'adaptable' and refer directly to the adopted Residential Layout Guidelines Supplementary Planning Guidance (SPG2).
- 178. From 1 October 2015, decision-takers must interpret these policies and the associated SPG by reference to the nearest equivalent national technical standard (the NDSS).

Practical Application

179. Existing Council standards set out in the Guidance for HMO Amenity Space are room-based minimums. At the same time, NDSS is a unit-based gross internal area minimum depending on occupancy. Moreover, there is no policy link to the application of the AS in the consideration of planning applications. The AS are not listed as a SPD, SPG or even informal guidance.
180. Compliance with NDSS can only be required if there is an enabling Local Plan policy. The Council has specified that CS18, CS19, and saved policies H5 and AP1, plus SPG2, should be interpreted with reference to the NDSS. Table 1 of the Housing Standards Policy Statement with SPG2 tells us the two are incompatible; the room size requirements subsequently stated no longer apply.
181. And so, the applicant contends that the NDSS takes precedence over any local space standards, in particular the Guidance for HMO Amenity Space that principally guide the HMO licensing regime and are not an identified SPD, SPG or Informal Guidance.
182. In this case, the proposals comply with the NDSS for an **8**-person, **3**-storey dwelling and that takes precedence over the Council's Guidance for HMO Amenity Space.

Car Parking and Accessibility

183. The existing, lawful Class C4 small HMO use of the property has no in-curtilage parking provision. The proposal cannot change that position.
184. The Council manages parking controls relevant to HMO proposals through a combination of Local Plan policies, supplementary guidance, and borough-wide parking enforcement policies. There are no HMO-specific parking standards in the Core Strategy itself. Still, HMOs are subject to general residential parking requirements, which are interpreted through both policy and operational enforcement.

Key Parking Controls for HMOs

185. HMOs in Gravesham are subject to the borough's general vehicle parking standards (SPG4 July 2006), which set recommended off-street parking provision for various uses. It supplements Kent and Medway Structure Plan 2006 Policy TP3, *Transport and the Location of Development*, and Policy TP19, *Vehicle Parking Standards*.
186. LP Policy P3 sets expectations for vehicle parking standards for new development in the borough. The policy also requires developers to provide vehicle parking in line with the Kent County Council Vehicle Parking Standards, unless there is a valid justification for an exception.

-
187. LP Policy T1, *Impact of Development on the Highway Network*, on the other hand, requires new development proposals not to cause significant harm to the highway network, meaning they must not create unacceptable impacts such as congestion, unsafe conditions, or inadequate access.
 188. The proposal is a sui generis use, and SP4 applies maximum parking standards, not minimum ones, for such uses. Planning applications for HMOs must demonstrate that adequate parking is provided for residents, and these requirements are assessed for suitability, location, and scale on a case-by-case basis.
 189. The proposal would result in an increase in occupancy, without any increase in on-site car parking provision. Yet, the property is in a sustainable location where everyday services, facilities and employment opportunities can be reached on foot, by bicycle or a short public transport journey. The additional two occupants, like the existing six HMO occupants, are not heavily reliant on private motor vehicles for transport.
 190. There does not appear to be any significant parking controls in the area, including any controlled parking zones for permit holders.
 191. So, roadside parking is available, and it is evident that vehicles are parked on one or both sides of the surrounding roads without causing obstruction.
 192. The applicant contends that the proposal, when taken in the context of the existing small HMO and lack of in-curtilage parking provision, would not, through the increase in occupants by two people, have an adverse impact on on-street parking or be detrimental to highway safety.
 193. Moreover, the proposal will provide bicycle storage that cannot be enforced on the existing HMO, and this will promote sustainable transport choices over private motor vehicle travel.
 194. Tenants will be informed about public transportation options in the vicinity. These measures and controls will also help ensure that end-users do not exacerbate any parking problems in the area.
 195. Accordingly, the applicant would welcome a condition of planning permission to ensure that enough cycle parking is provided and that all tenants are notified that there is no in-curtilage parking provision and that off-site parking provision is limited.
 196. The applicant contends that the proposal does not conflict with SPG4 or Saved LP Policies T1 and P3. Nor does it conflict with the broader in scope transport policies, CS Policies CS11 and CS19. The latter policy requires car parking to be well related to the development it serves. Off-site parking availability is well related to the property.

197. Additionally, it would also not be contrary to the Framework, which seeks to prevent or refuse development on highway grounds only if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

Bicycle Parking

198. There are no bicycle parking standards for sui generis uses in SPG4. It states that cycle parking provision will be determined on an individual basis.
199. It is proposed to provide a bicycle store to the rear of the property that can accommodate **8** bicycles, one for each occupant.
200. The applicant contends that this provision is sufficient.

Character of the Area and Dwelling

201. No extensions or alterations are needed to facilitate the change of use of the property to a large HMO. So, the proposal will not impact the appearance of the property, save for ensuring that bins are stored to the rear of the property, improving the visual amenities of the street.
202. The property is already in residential use in a predominantly residential area. The property will remain in residential use and will not impact the character of it or the area.

Biodiversity Net Gain

203. Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 sets out that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the '*biodiversity gain condition*' requiring development to achieve a net gain of **10%** of biodiversity value. This is subject to exemptions as set out in The Biodiversity Gain Requirements (Exemptions) Regulations 2024.
204. Hard surfaces such as tarmac and buildings are excluded from the calculation of the **25m²** exemption threshold for Biodiversity Net Gain. The exemption applies only to the area of on-site habitat with a biodiversity value greater than zero (i.e., vegetated or natural habitats, not sealed surfaces). Hardstanding and sealed surfaces are assigned a biodiversity value of zero in the statutory biodiversity metric and therefore do not count towards the **25m²** exemption threshold.
205. Only the siting of a bicycle store and bin store could impact any biodiversity, and those areas are far less than the 25m² exemption threshold.
206. Accordingly, the proposal is BNG exempt.

Special Protection Area (SPA) and SAMMS

207. The property is located within 6 km of the Thames Estuary and Marshes Special Protection Area [[SPA](#)].
208. The SPA are internationally important for nature conservation as the area is a wetland and supports important numbers of wintering water birds and migrating birds. There has been a decline in the number of birds using these sites in recent years. Studies show that this could be due to people using the estuary and marshes for recreation purposes. The North Kent Bird Disturbance Report concludes that all new housing development within 6km of the North Kent Ramsar Sites or Special Protection Areas (including the Thames Estuary and Marshes) and larger housing development beyond 6km from the sites could have an adverse impact on them. This is because new housing development is likely to lead to further increases in recreational use of the sites, which means that further declines in the bird population cannot be ruled out. Possible mitigation measures are set out in the Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy.
209. Having considered several options, the Council have decided to impose a tariff on new housing development. Developers will need to pay £337.49 for every new dwelling provided within 6km of the Ramsar site and SPA, and for larger housing developments beyond 6km from them.
210. The money raised will be used to pay for schemes to avoid the adverse impacts of new housing development on the birds.
211. In this instance, the proposed development would result in a two-person increase in occupants of an existing Class C4 small HMO and negligible additional recreational activity. Therefore, the applicant contends that there would not be an adverse impact on the Thames Estuary and Marshes Ramsar Buffer Zone, which should be mitigated in line with Policy CS12.
212. In such cases where the Council consider there is an adverse impact, it has adopted a tariff that is payable for each new dwelling unit within 6km of the SPA/Ramsar site of £337.49 per new bedroom.
213. The applicant would, if the Council deems necessary, have to pay the SAMMS Mitigation Contribution Agreement for the new residential property to meet the requirements of the Habitat Regulations and Section 15 of the Framework and CS Policy CS12.

Conclusion

214. Considering all the most important policies of the local plan and the SPGs, SPDs and informal guidance that officially support them, the applicant is confident that there is no conflict between their proposal and the Development Plan.

National Policy

215. The National Planning Policy Framework [*Framework*] was last updated on 7 February 2025. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless there are material considerations that indicate otherwise. The Framework is a material consideration.
216. At the heart of the Framework is a presumption in favour of sustainable development. Local planning authorities should approve proposals that accord with an up-to-date development plan without delay.
217. They should also grant permission where there are no relevant development plan policies or the most important policies for determining the application are out-of-date unless policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole.
218. This statement demonstrates that the proposal adheres to the relevant policies of the Local Plan and guidance of a lesser weight set out in supplementary planning documents.
219. The Framework provides no specific guidance on HMO or student accommodation proposals, except for a general accord with the Council's Policy and paragraph 63 of the Framework regarding the intent to create and maintain sustainable, inclusive homes.

'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.'

220. The purpose of the planning system is to contribute to sustainable development. It plays an important social role in meeting the needs of present and future generations across various tenure forms. There is no conflict between the proposal and Part 8, *Promoting Healthy and Safe Communities*.
221. The Framework aims to maintain a high standard of amenity for both existing and future occupants. It states that planning decisions should mitigate and reduce to the minimum the potential adverse impacts of noise from new developments, and avoid noise that gives rise to significant adverse impacts

on health and quality of life. The Framework refers to the Noise Policy Statement for England, which assists in interpreting noise impacts.

222. The statement identifies three types of noise. It would be '*neighbour noise*' that, without appropriate controls, may be an issue in this case – i.e., noise from inside and outside people's homes. The applicant acknowledges that noise exposure can cause annoyance and sleep disturbance, impacting the quality of life. There is also a need to consider the economic and social benefits of the activity alongside the environmental effects.
223. However, subject to appropriate measures and controls advocated in this statement, the proposal would not amount to a '*significant adverse impact on health and quality of life*', the test in the Framework.
224. Part 12 of the Framework seeks to achieve well-designed places. It recognises that good design is fundamental to sustainable development. Having considered the proposal against Local Plan policies, the applicant contends that their proposal is well-designed.
225. Accordingly, the applicant suggests that the Council has grounds to grant planning permission for this acceptable proposal by virtue of paragraph 11(c) of the Framework, which presumes in favour of sustainable development.

Conclusion

226. The proposal has been thoroughly considered in relation to the most important existing policies of the local plan and the supporting SPGs, SPDs and informal guidance.
227. The applicant contends there is no conflict between their proposals and those policies and guidance, as far as they are applicable. Furthermore, there is no conflict between it and the broader policies of the Framework.
228. Consequently, the applicant considers this a form of sustainable development that does not conflict with the Framework policy and can be approved without delay, as per paragraph 11(c).

Design

230. The applicant intends to ensure that their proposal sits comfortably and appropriately in its setting. This section demonstrates how the proposal aligns with the Development Plan and the National Planning Policy Framework in terms of its design.

Use

231. It is proposed to change the use of the property from a Class C4 small HM accommodating six people, to a sui generis, large HMO accommodating eight people. This proposal should be gauged as a net increase of only **2** people residing on the property.

Amount

232. It is proposed to house **8** people, each with a single-occupancy bedroom. No in-curtilage parking provision is provided, although the proposal allows for the provision of secure storage for **8** bicycles.

Layout

233. Bins and bicycle racks are provided at the rear of the property, largely hidden from public vantage points.
234. There will be three en-suite bedrooms on the ground floor as well as a communal area comprising a kitchen and dining space.
235. A further **3** en-suite bedrooms are proposed on the first floor.
236. And lastly, there are two bedrooms in the loft space, one of which has an en suite shower room and the other served by a separate, adjacent shower room.

Scale and Form

237. The proposal leads to a net increase of **2** people accommodated on the property above that of the existing, lawful small HMO use. The applicant contends that the residential scale of use is appropriate.
238. The proposal does not impact the form of the external envelope of the property in any way.

Landscaping

239. No additional hard or soft landscaping is proposed.

Appearance

240. The proposal, comprising no external alterations to the building envelope, will not impact the appearance of the property, save for the keeping of bins in a bin store to the rear that will improve the visual amenity of the street.

Access

241. The property is accessible by a public network of footpaths and roads. Hence, the site is not isolated from people, buildings, or places.
242. It has excellent access to the public transport network, a short walk away.
243. It is within walking and cycling distance of everyday services, facilities, and employment opportunities.

Inclusive Access

244. Should a need arise, the building will be further adaptable. It is accessible to people with impaired mobility and other disabilities, including those with visual or hearing impairments.

Consultation

245. The applicant will rely on responses to the Council's publicity and consultation, as per The Town and Country Planning (Development Management Procedure) (England) Order, as amended, to identify any areas of concern, including access.

Specific Issues

246. The property is within Flood Zone 1, as shown on the Environment Agency's Flood Map for Planning, with a low probability of flooding from rivers and the sea. **End of Statement**

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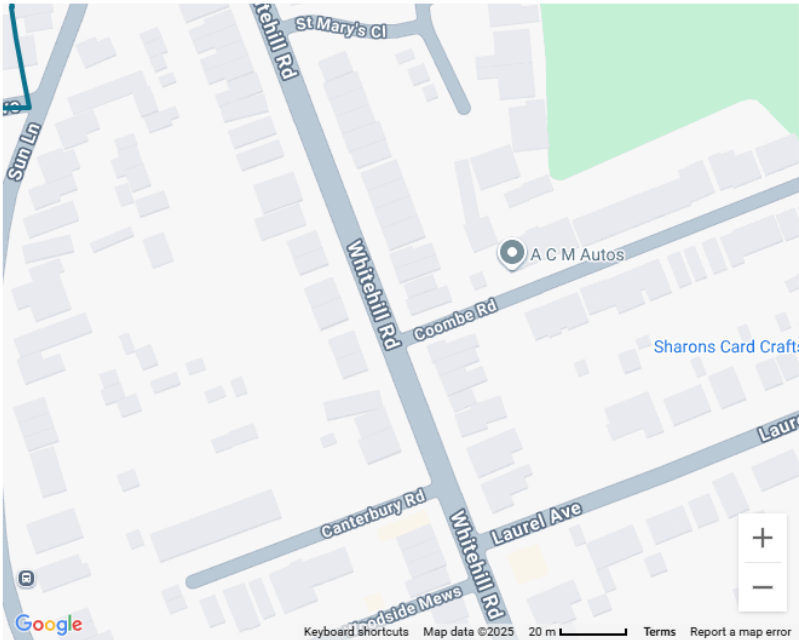
PS

Design & Access/ Planning Statement

Appendix 1 - Police Crime Reports

Image by Freepik

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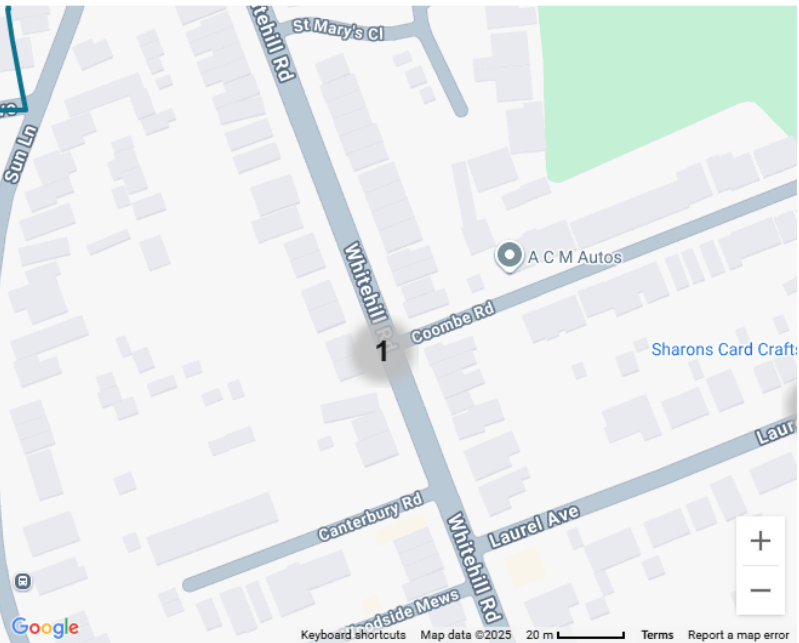
Anti-social behaviour (13) ▼

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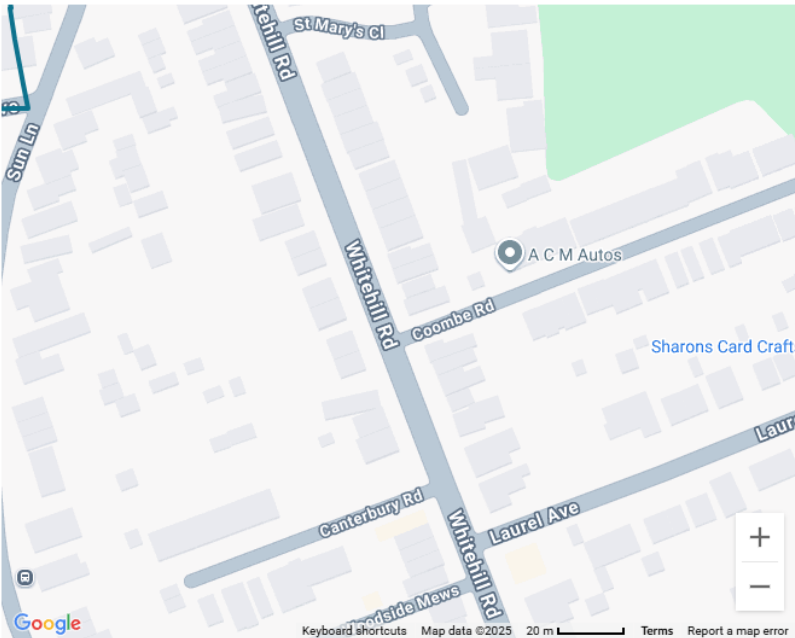
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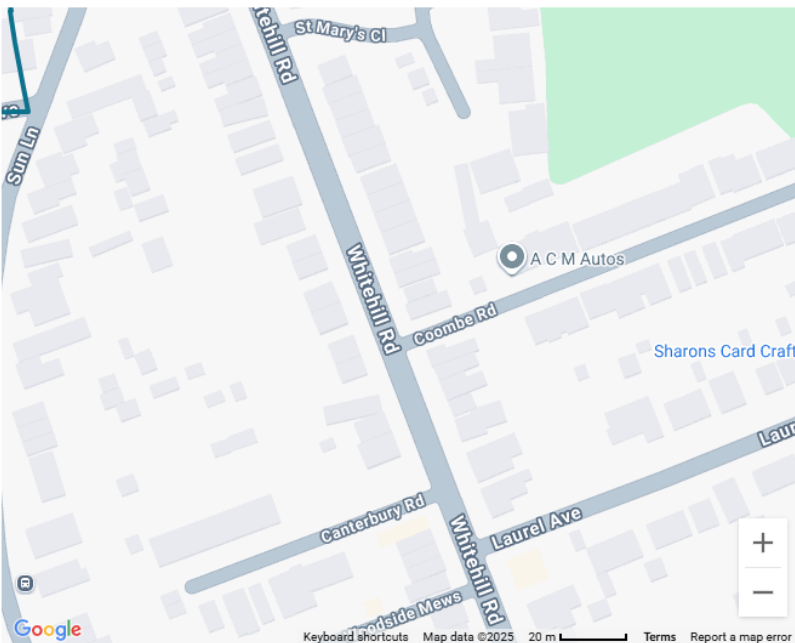
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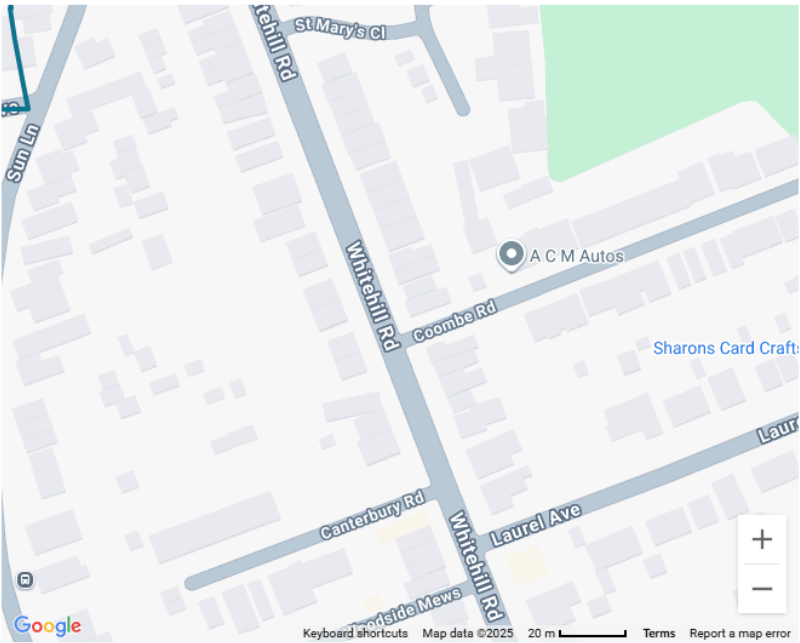
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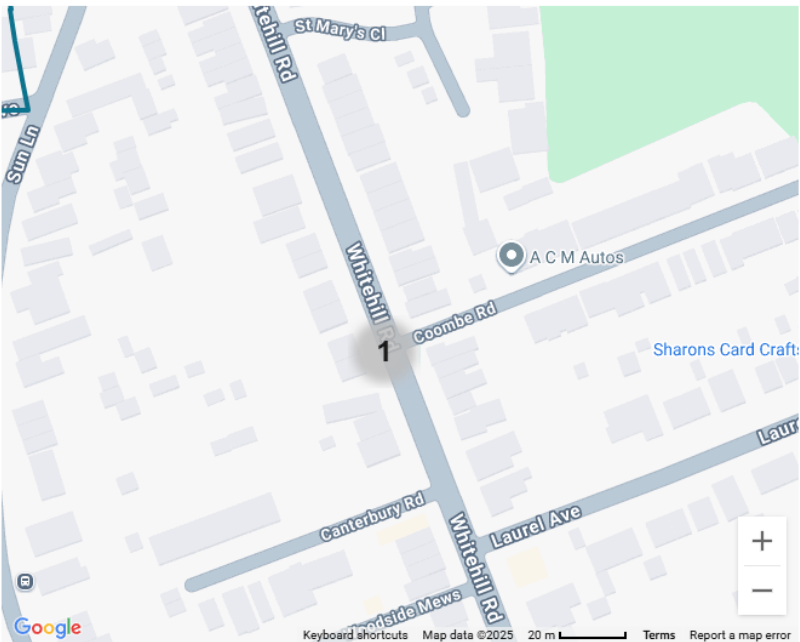
Anti-social behaviour (6) ▼

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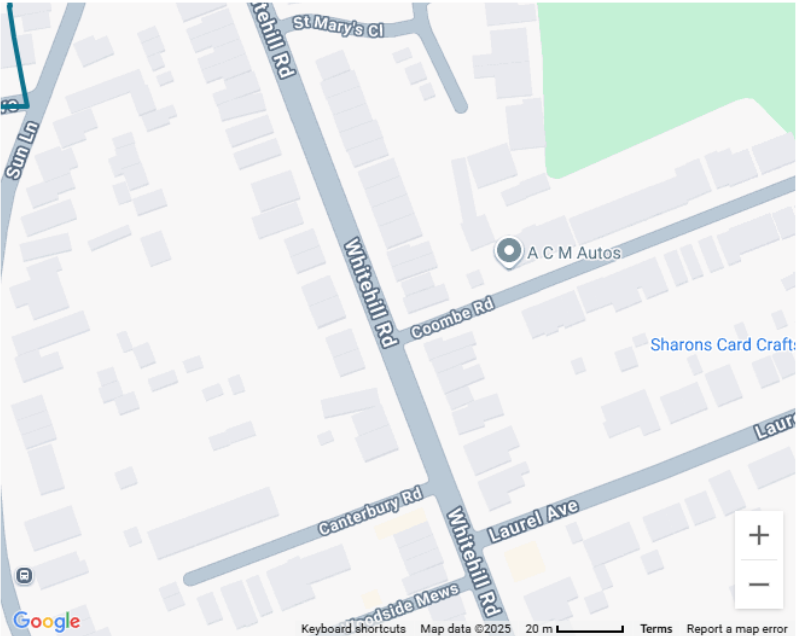
Anti-social behaviour (4) ▼

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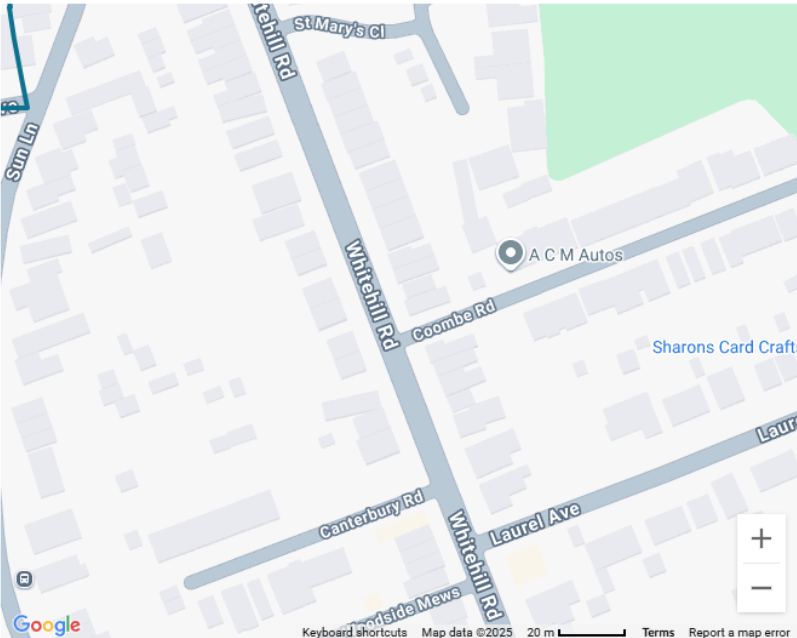
Anti-social behaviour (5) ▼

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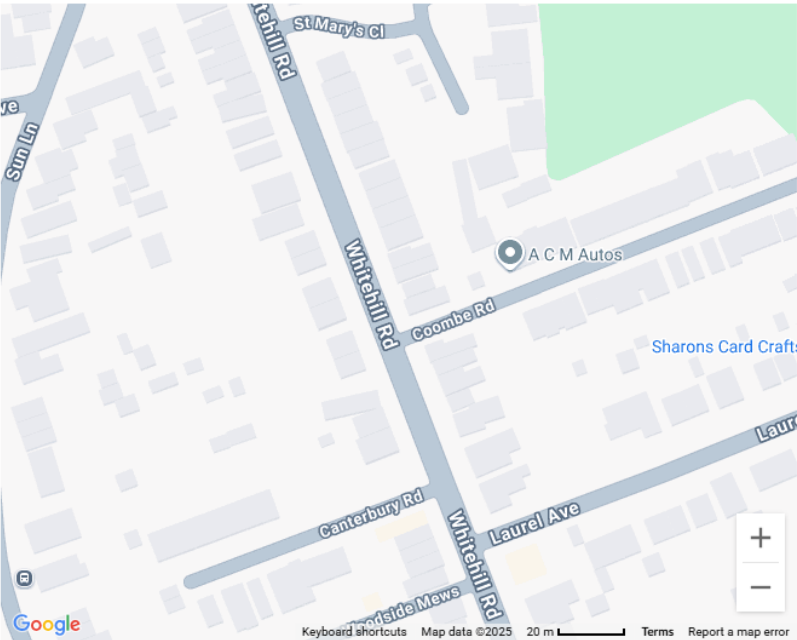
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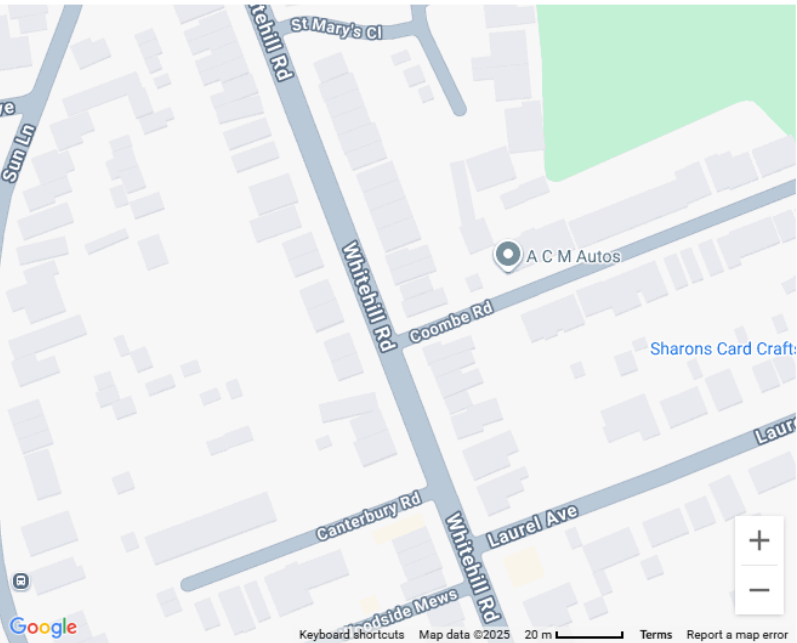
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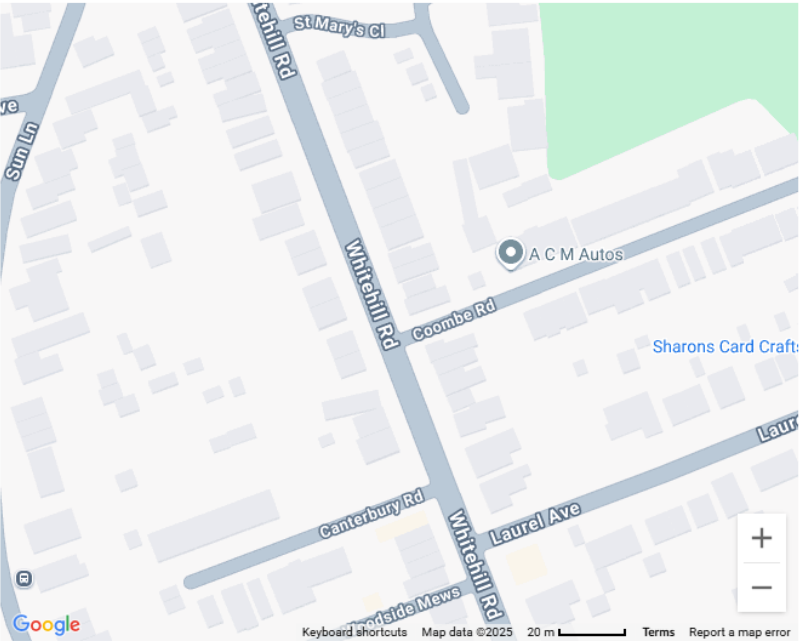
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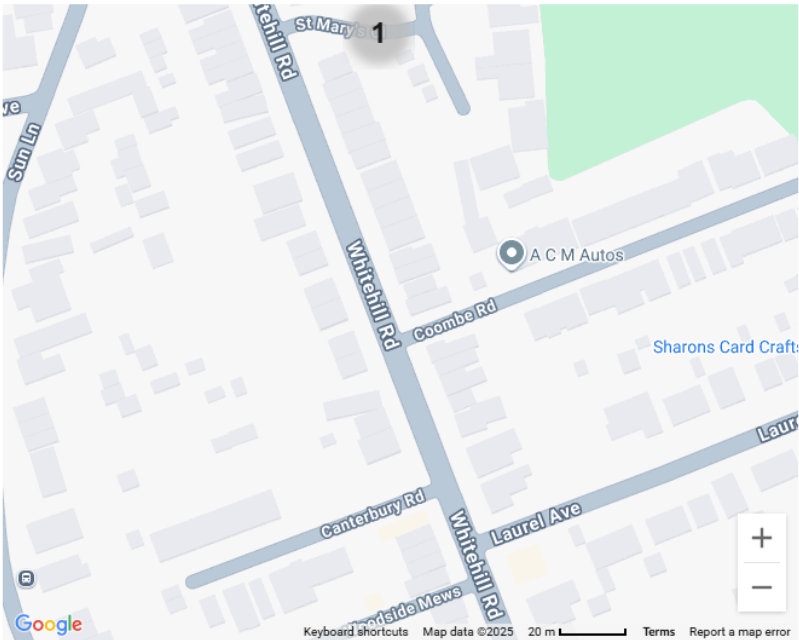
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