

# Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10/01/2026 4:37 PM from [REDACTED]

## Application Summary

Address:	50 Whitehill Road Gravesend Kent DA12 5PG
Proposal:	Change of use from a small house in multiple occupation (Use Class C4) to an 8-bedroom, 8-person, large HMO (sui generis) and provision of bicycle and bin stores to the rear.
Case Officer:	Mrs Lisa Fisher

[Click for further information](#)

## Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	[REDACTED] Gravesend Kent

## Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application

Reasons for comment:

Comments: I object to the above application on the grounds that the proposal conflicts with adopted Gravesham Local Plan policy and would result in an unacceptable over-intensification of residential use, causing harm to local amenity, parking conditions, and the character of the area.

### Conflict with Gravesham Local Plan Policy

Policy CS02 (Development and Design Principles) requires development to protect the amenity of existing residents and respect the character of the surrounding area. The proposed change from a small HMO (Class C4) to an 8-person large HMO (sui generis) represents a significant intensification of use which would materially alter the way the property functions within a settled residential street.

Policy CS11 (Housing) seeks to ensure a balanced mix of housing types and avoid developments that undermine the stability and cohesion of residential areas. Large HMOs, by their nature, introduce a transient population and levels of activity materially different from family housing or small shared homes. The proposal conflicts with this objective.

Policy DM01 (Core Design Principles) requires development to function

satisfactorily in its context and avoid adverse impacts arising from scale, intensity, or operation. An 8-bedroom HMO introduces an intensity of occupation and associated activity that is out of keeping with the prevailing residential character of Whitehill Road.

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#### Residential Amenity Impact

The proposal would likely result in:

- Increased noise from multiple unrelated occupants with differing daily routines.
- Greater levels of comings and goings, particularly during evenings and weekends.
- Increased visitor activity and deliveries.
- Higher refuse generation and pressure on external areas.

Inspectors have consistently held that the cumulative impact of these factors in large HMOs can be harmful to residential amenity, even where each impact taken individually may appear modest.

In Appeal Ref: APP/X5210/W/17/3175157 (Islington), the Inspector dismissed a large HMO proposal, concluding that the intensity of occupation and associated activity would erode residential amenity and the character of the area. Similar reasoning applies here.

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#### Parking Stress and Highway Impact

The proposal makes no adequate provision to address parking demand arising from eight adult occupants. Whitehill Road is a typical residential street where on-street parking is a shared and finite resource.

Policy CS02 and NPPF paragraph 111 require development to avoid unacceptable impacts on highway safety and the efficient operation of the road network. Inspectors have repeatedly recognised that large HMOs generate parking demand disproportionate to that of family dwellings.

In Appeal Ref: APP/Q5300/W/19/3228242, the Inspector confirmed that increased parking pressure associated with a large HMO justified refusal where it would inconvenience existing residents, even in the absence of formal parking restrictions.

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#### Over-Intensification and Character of the Area

The proposed development would introduce a form of occupation materially different from the established pattern of residential use. While HMOs are not inherently unacceptable, the scale of this proposal risks tipping the balance away from a stable residential environment.

In R (Gleeson) v Secretary of State for Housing, Communities and Local Government [2019], the Court confirmed that decision-makers are entitled to consider whether the intensity and nature of HMO use would undermine the character and balance of an area.

The designation of this proposal as sui generis reflects that it falls outside normal residential use and therefore warrants careful control. In this case, that control should be exercised through refusal.

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### Conclusion

The proposal conflicts with Gravesham Local Plan Policies CS02, CS11, and DM01, and with the aims of the National Planning Policy Framework to protect residential amenity and promote well-balanced communities.

The scale and intensity of the proposed large HMO would result in unacceptable harm to residential amenity, increased parking pressure, and erosion of local character. The application should therefore be refused.

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Kind regards