



29th December 2025

Mrs Lisa Fisher
Planning Department
Gravesend Borough Council
Civic Centre
Windmill Street
Gravesend
Kent DA12 1AU

WITHOUT PREJUDICE

Dear Planning Officer

**OBJECTION TO CHANGE OF USE TO 8-PERSON LARGE HMO
(sui generis) at 50 WHITEHILL ROAD, GRAVESEND REF 20251255**

I am writing as the owner/occupier of [REDACTED]
[REDACTED] the application site. I wish to strongly object
to the proposed development on the following grounds.

INTENSIFICATION OF USE

UNACCEPTABLE NOISE AND DISTURBANCE (POLICY CS19)

[REDACTED] with number 50. The houses were
designed for family occupation with minimal sound insulation. The
proposal to house 8 unrelated adults is a significant intensification of
use. Bedrooms are against the party wall on all floors. Unlike a single
family, 8 individuals operate on different schedules increasing noise,
such as doors slamming, footsteps, music possibly 24 hours a day
inconsistent with a quiet residential terrace.

The applicant's statement in para 53 states that Part E of Building
Regulations (soundproofing) does not apply to this change of use. If
approval is given, I am deeply concerned. It is important that a condition
is attached requiring high-grade sound insulation be installed to the
party wall before occupation to protect my family's residential amenity
as guaranteed by Policy CS19.

The change undermines the residential balance of the road, turning the family-oriented terrace into a transient high-turnover environment.

Moving from a C4 to an HMO is an over-development of this mid-terrace site. The infrastructure and layout of these older terraced homes are simply not designed for high density occupation without severely impacting the character of the area and the lives of immediate neighbours. Not to mention the occupants, sharing with seven other individuals.

LACK OF COMMUNAL LIVING SPACE

The proposed floor plans show only the kitchen/diner as the only communal area. This lack of internal social space could potentially force more activity outside, such as smoking at the front and rear of the property making more noise. It will impact [REDACTED] peace and privacy, and that of the neighbours. I note the applicant suggests communal living space is not necessary, but this is bad living design. At present there are no properties in this area where people congregate outside, it would undoubtedly affect the character of the neighbourhood.

PARKING SATURATION POLICY CS11

KCC Parking standards require adequate provision for new developments. Lack of dedicated spaces mean this proposal will exacerbate parking, already at peak capacity. Buses and emergency vehicles could be affected by congestion and possible pavement parking.

The applicant argues roadside parking is available. However, there is always a parking problem in Coombe Road. To add potentially 7 more vehicles will make parking even more difficult and will inevitably cause overspill in nearby roads. Whitehill Road is on a bus route, so parking in the road itself is restricted. Housing opposite have driveways limiting spaces for parking. Residents in Coombe Road and this part of Whitehill Road will suffer even more stress when parking their cars.

WASTE AND REFUSE MANAGEMENT

A household with 8 residents will generate a significant volume of waste. The plan for bin storage seems insufficient for this number of people. If the bins are not monitored and they overflow, this will increase the likelihood of vermin and unsightly rubbish accumulating

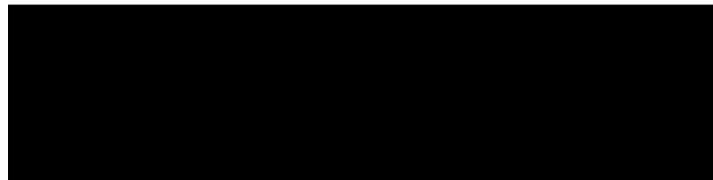
on the surrounding streets. In summer with fortnightly collections, there could also be a risk of bad smells emanating from that area, which is adjacent to our patio and leisure area.

CONCLUSION

The proposal is an over-development of a constrained site that fails to respect the character of the street or the right to amenity of the neighbours.

I request the Planning Department refuses this application to protect the balance and quality of the local residential environment.

Yours faithfully



Attached please find photos supporting this objection.