



Planning Services
GBC

Private Sector Housing

Ask for: PSH Team

Telephone: 01474 337960

Email: private.housing@gravesham.gov.uk

Your ref: 20251255

Date: 19th February 2026

Dear Planning Services,

Location: 50 Whitehill Road Gravesend Kent DA12 5PG

Application: 20251255

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.

Thank you for your recent consultation request regarding the above-mentioned proposal. Our observations are as follows, in relation to Drawing No 002-GA.

Proposed Bedroom 3 leading directly off of a high-risk room (communal kitchen) is not favourable. There is not a suitable means of escape nor secondary means of escape highlighted for this bedroom. We cannot accept the primary means of escape through a high-risk room.

Proposed Bedroom 3 (7.9m²) and Bedroom 5 (7.6m²) are undersized. Where rooms fall below 10m² required for combined bedroom and living space for single occupancy, additional communal space must be provided within the dwelling.

Changing the use of the current living space on the ground floor to a bedroom and the study on the second floor to a bedroom, impact the requirements for the remaining bedrooms. As there would be no separate communal living space, Bedroom 2 (7.5m²) and Bedroom 5 (7.5m²) would need to be reassessed as combined bedroom and living space.

We would welcome a 7 Person 7 Household HMO.

Where the HMO is the applicants preferred option, the team welcomes a conversation or site visit to the premises to discuss licencing and amenity requirements at the earliest opportunity.

Gravesham Borough Councils amenity standards can be found on our website at <https://www.gravesham.gov.uk/licensing/houses-multiple-occupation-1>

Yours Sincerely

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