

PLANNING STATEMENT

50 Whitehill Road, Gravesend – Planning Application for Change of Use from a Small HMO (Use Class C4) to a Large HMO (Sui Generis) for 7 Occupiers

1. Introduction & Background

This Planning Statement has been prepared in support of a full planning application for the change of use of 50 Whitehill Road, Gravesend from a lawful small House in Multiple Occupation (Use Class C4) occupied by up to 6 persons to a large House in Multiple Occupation (sui generis) occupied by up to 7 persons. The application is submitted as a revised scheme following the refusal of application 20251255, which is currently the subject of an appeal. The property already benefits from a Certificate of Lawful Proposed Use (ref. 20250220) confirming its lawful use as a 6-person HMO, and the physical works that facilitate that use, including the rear extension and roof alterations, have already been completed under permitted development rights. The proposal does not involve external alterations and instead comprises a modest internal reconfiguration to provide one additional bedroom within the existing building envelope.

The proposal involves no external alterations. All changes relate to internal reconfiguration to create one additional bedroom.

The applicant intends to let the property to professionals or young professionals, emphasising sustainable travel, good management, and compliance with licensing standards.

2. Site Context, Location & Access

The property is a two-storey mid-terrace dwelling with a loft conversion, located in a predominantly residential area south of Coombe Road.

It is not in a Conservation Area and lies within 6 km of the Thames Estuary & Marshes SPA.

Key locational advantages include:

- High accessibility to bus routes on Whitehill Road and Old Road East
- 1 mile from Gravesend Station (14 minutes by bus)
- Walkable access to shops, services, and employment
- Rear pedestrian access via a gated footpath
- No on-site parking, consistent with the existing lawful HMO use

The property's layout includes six existing en-suite bedrooms, a communal kitchen/diner/lounge, and front and rear gardens.

3. Development Plan Framework

The proposal is assessed against:

Local Policy

- **Gravesham Local Plan Core Strategy (2014)** Relevant policies: CS01, CS02, CS11, CS14, CS15, CS18, CS19
- **Saved Gravesham Local Plan First Review (1994)** Relevant policies: H5, H6(iii), T1, P3
- **Kent Minerals & Waste Local Plan (2024–30)**

Supplementary Guidance

- Residential Layout Guidelines (SPG2, updated 2020)
- Parking Standards (SPG4)
- Design Code
- Householder Extensions SPD

National Policy

- National Planning Policy Framework (NPPF)
- Nationally Described Space Standards (NDSS)
- Housing Act 2004 & HMO Licensing Regulations

This application falls to be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, the relevant policies are those concerned with sustainable development, housing mix, amenity, design quality, accessibility and parking, together with national policy in the National Planning Policy Framework and the nationally described space standard.

4. Principle of Development

4.1 Housing Need

The proposal represents a modest intensification of an existing lawful HMO use in a sustainable residential location. The site already functions as a 6-person C4 HMO and the application seeks permission only for an increase to 7 occupiers, thereby moving the use into the Sui Generis Use Class. As such, the key issue is not whether HMO use is acceptable in principle, but whether the incremental change from 6 to 7 occupiers would give rise to unacceptable planning harm when assessed against the development plan as a whole.

In principle, the proposal is supported by the following planning considerations:

- It would make more efficient use of an existing residential property in a sustainable location with good access to public transport, local services and employment opportunities.
- It would contribute to the supply of flexible, lower-cost shared accommodation by increasing the lawful occupancy from 6 to 7 persons.
- It accords with the objective of securing a range and choice of accommodation, while making effective use of the existing housing stock.

4.2 Existing Baseline

The existing fallback position is an unrestricted 6-person C4 HMO. That fallback is an important material consideration as the site already lawfully accommodates shared residential occupation. The practical consequence of the proposal is therefore limited to one additional occupier.

Any assessment of effects on amenity, parking, activity levels and general living conditions must be undertaken against that existing lawful baseline rather than against occupation as a single dwellinghouse.

- Impacts must be judged against the existing uncontrolled HMO use.
- A planning permission would allow the Council to impose controls (e.g., management plan, noise attenuation) that cannot be applied to the existing C4 use.

5. Residential Amenity – Neighbours

The statement provides an extensive assessment of potential impacts:

5.1 Noise & Disturbance

- No external changes → no impact on privacy, daylight, or outlook.
- Internal noise can be mitigated through sound attenuation, matching Building Regulations Part E standards (43 dB airborne, 64 dB impact).
- The Applicant has building control sign off for the property, which includes acoustic insulation.

5.2 Property Management Plan (PMP)

A PMP is attached to this application and will manage:

- Tenant behaviour
- Noise and anti-social behaviour
- Waste management
- Maintenance

- Neighbour liaison

A property management approach can be secured and monitored through the HMO licensing regime and, if necessary, by condition. This would ensure that the occupation of the property remains properly managed and would provide a stronger degree of operational control than would exist under the unrestricted fallback position.

5.3 Property Condition, Litter & Local Services

- The property is well-maintained and recently refurbished (photos showing the high quality refurbishment are included at Appendix 2 below).
- No evidence of littering or flyposting linked to HMOs in the area.
- No demonstrable impact on local services from a modest intensification of occupants.

6. Residential Amenity – Future Occupants

6.1 Nationally Described Space Standards (NDSS)

- All bedrooms exceed the 7.5 m² single occupancy minimum.
- The property's GIA is 142.7 m², comfortably exceeding the NDSS benchmark commonly used for larger shared houses of comparable scale. For context, the NDSS minimum for a 6-bed, 7-person, 3-storey dwelling is 129 m².
- NDSS does not specify communal room sizes.

6.2 Local Space Standards

- Gravesham's Residential Layout Guidelines (1996, updated 2020) are incompatible with NDSS.
- SPG2 states that where conflict exists, NDSS prevails.

6.3 HMO Amenity Standards (Licensing)

Although not planning policy, the proposal meets or exceeds:

- 6.51 m² minimum bedroom size
- Kitchen requirement: 11 m²
- Dining requirement: 2 m² per person (14 m²)
- Combined kitchen/diner requirement: appropriate for 7 occupiers and capable of meeting the Council's amenity standards where layout and equipment provision are compliant.
- Living room: 10.2 m²

6.4 External Amenity Space

- No fixed standards for HMOs.
- Adequate garden space exists for drying, sitting out, and refuse storage.

Overall, the proposal would provide satisfactory living conditions for future occupiers. The accommodation would remain within the established built form, all bedrooms would exceed the single-room minimum, and the property's gross internal area of 142.7 m² exceeds the benchmark in the [Nationally Described Space Standard]() for a comparable 6-bedroom, 7-person, 2- or 3-storey dwelling.

7. Parking, Transport & Accessibility

- No on-site parking exists for the current HMO; this remains unchanged.
- The site is in a highly sustainable location with strong public transport links.
- SPG4 applies maximum, not minimum, parking standards for sui generis uses.
- No Controlled Parking Zone exists nearby.
- On-street parking is available without causing obstruction (photos showing a snapshot of parking spaces available are included below at Appendix 1).
- Bicycle storage will be provided, improving sustainability.

In transport terms, the proposal would not materially alter the existing situation. The site has no off-street parking at present and lawfully operates as an HMO. The increase from 6 to 7 occupiers is modest, the location is sustainable, and the relevant Kent and Gravesham parking guidance applies maximum rather than minimum standards. In those circumstances, there is no sound basis to conclude that the proposal would result in unacceptable parking stress or highway harm.

8. Character of the Area, Biodiversity & SPA

8.1 Character

- No external alterations → no impact on streetscape.
- The area already contains a mix of dwelling types.

8.2 Biodiversity Net Gain

- Minor internal change → no measurable biodiversity impact.
- BNG requirements are minimal for this scale of development.

8.3 Special Protection Area (SPA) & SAMMS

- The site is within 6 km of the Thames Estuary & Marshes SPA.
- Standard SAMMS mitigation payment may be required.
- No direct ecological impact arises from the proposal.

The applicant is willing to make a SAMMS payment or a s106 payment on request.

9. Overall Planning Balance & Conclusions

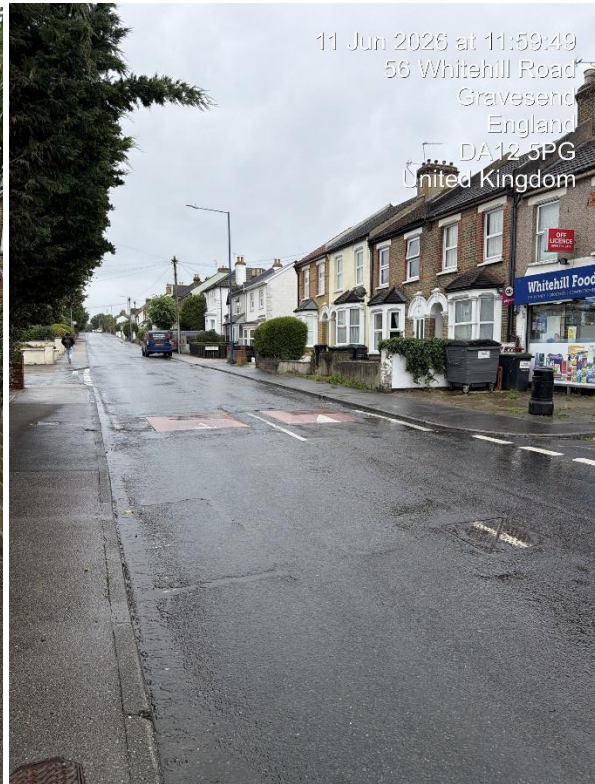
When assessed against the development plan as a whole, and having regard to material considerations, the proposal should be supported for the following principal reasons:

- The proposal is policy-compliant with the Development Plan when read as a whole.
- It contributes to housing supply during a period of significant shortfall.
- Neighbour amenity can be protected or improved through conditions.
- Occupant amenity meets NDSS and licensing standards.
- No harm arises to character, parking, biodiversity, or the SPA.
- The proposal constitutes a proportionate and sustainable change of use from a lawful 6-person C4 HMO to a 7-person sui generis HMO.

For the reasons set out in this Planning Statement, it is concluded that the proposed change of use from a lawful 6-person small HMO (Use Class C4) to a 7-person large HMO (sui generis) would represent an acceptable and sustainable form of development. The proposal would not give rise to unacceptable harm to residential amenity, parking, highway safety, character or environmental interests, and it would make more effective use of the existing housing stock. Planning permission should therefore be granted.

APPENDIX 1

Snapshot of parking availability





APPENDIX 2

Internal Amenity Standards





APPENDIX 3

Escape Window to Bedroom 3



