

Medway Council  
Planning Department

June 2026

## Response to Neighbouring Objections

**Property Address: 11 Park Avenue, Gillingham, Kent, ME7 4AS**

**Proposal: Change of Use of Vacant Care Home (C2) to a 7no Room HMO (Sui Generis).**

This statement has been prepared in advance of the planning committee hearing for this application due to take place on 3<sup>rd</sup> June, to respond to the neighbouring objections. 7no comments were submitted by neighbours, objecting to this development. This statement outlines the concerns raised by the neighbours and explains how this submission has been carefully considered to address all of these concerns. The representations raise concerns about parking/traffic, character of the conservation area, loss of a care home, neighbour amenity (noise, privacy, waste, ASB), and HMO saturation. Each is addressed below in turn, using planning policy and the evidence in our submission.

### **Parking and Traffic**

**Objection:** No on-site parking; extra cars from the HMO (and the adjoining 13 Park Avenue) will overload street parking, worsen congestion (especially opposite Gillingham Park), and create safety hazards. Neighbours also argue the submitted parking surveys are unreliable.

**Response:** No car parking is provided on-site. However, this is proposed as a car-free scheme. The application site is located less than a 10no minute walk away from Watling Street, home to all key local amenities such as a supermarket, cafes and restaurants, a pharmacy and a post office. Medway Maritime Hospital and Gillingham Train Station are easily reachable via public transport from the application site. As such, it is expected that the tenants won't require private cars.

Bike storage is also provided on site to encourage tenants to utilise this sustainable mode of transport.

Please see the attached Transport Note, produced by Crosby Transport Planning. The report details the Lambeth Survey which was undertaken on site to assess the parking stress levels of the nearby area and

the findings of the survey that there is not a high level of parking stress. The report also estimates the proposed number of parking spaces required by the HMO and demonstrates that it would be similar to the existing C2 use and that there is plenty of spare capacity on the street for these spaces. As such, it is anticipated that the proposal won't have a negative effect on on-street parking and should therefore be deemed acceptable in this regard.

No highway authority objection was raised. The parking survey was prepared according to the accepted Lambeth Methodology, which is relied upon by all councils.

### **Conservation Area and Local Character**

**Objection:** A 7-bed HMO next to another HMO will harm the character of the Gillingham Park Conservation Area, introducing features out of keeping with the historic street (e.g. bike racks, bin stores). Park Avenue is mainly family housing/care homes, an HMO cluster is intrusive.

**Response:** Policy DM10 requires development in a Conservation Area to “contribute positively to the conservation and enhancement of the character, appearance and distinctiveness of the area”. The submitted Heritage Statement (supported by current guidance) finds no substantial harm to heritage assets. Converting the vacant care home into a residential use maintains the building in active use, which national guidance says is the best way to avoid neglect and decay. No historic features are removed, and external changes are minimal. A modest bicycle rack and bins are needed to comply with Policy T8 HMO waste/cycle standards and these have been sensitively sited. The proposal respects local character (no inappropriate alterations to the façade) and ensures the building's ongoing maintenance. This approach is entirely consistent with conservation policy; preserving its contribution to the street rather than leaving it empty or deteriorating.

No objection from the heritage officer was raised.

There are only 2no HMO's located on Park Avenue, with the rest of the character of the street being single-family accommodation. The introduction of a third HMO does not therefore change the character of the area or result in an oversaturation of HMO's as the overwhelming majority and character of Park Avenue will remain single-family accommodation.

### **Loss of Care Home and Housing Need**

**Objection:** The loss of a care home worsens the shortage of C2 (care) beds. There is demand for small residential care (families want choice), and the Council should upgrade the existing care home instead of allowing an HMO.

**Response:** The submitted viability evidence shows no realistic demand for continued use of this small care home. This site no longer meets the operational needs of the care home sector. These limitations are identified within the report, including its arrangement across multiple floors, narrow corridors, the absence of lift access, shallow and narrowing staircases serving the upper floors, and the lack of en-suite bedroom facilities. While the applicant explored various adaptations measures in an attempt to modernise the property and facilitate continued operation, owing to the structural limitations and internal configuration of the building, such measures were ultimately found to be impractical and unfeasible. In contrast, larger care facilities are being delivered elsewhere (e.g. ~210 new beds under construction) to meet acute need. The NPPF and planning guidance emphasise that keeping heritage buildings in active use is vital. Converting to a well-managed HMO preserves the property's residential function and it avoids the greater harm of vacancy and disrepair. It also addresses identified local housing needs (for single affordable households) without undermining larger-scale social care provision. In our planning balance, this change of use secures a viable use of the building and enables necessary reinvestment in maintenance (consistent with heritage guidance).

#### **Neighbour Amenity (Noise, Privacy, ASB)**

**Objection:** A large HMO will generate excessive noise, disturbance and anti-social behaviour (especially with more day visitors, gatherings, etc.), and will overlook neighbours (invasion of privacy). In particular, a resident's disabled child requires a quiet, stable home.

**Response:** Policy T8 requires HMOs to "not adversely affect the character and amenity of the area". Our design specifically safeguards amenity: all bedrooms and communal rooms meet or exceed the National Space Standards, ensuring no overcrowding. Shared living spaces (kitchen, living room) limit noise to a single communal area rather than multiple family units. Importantly, the rear and front balconies will be bolted shut, as noted in our statement, eliminating any overlooking or loud outdoor activity. Vehicle movements are minimal as this will be a car-free scheme. The evidence is that well-managed HMOs can integrate without undue disturbance; indeed Policy T8 encourages HMOs that meet amenity standards. The intensity of occupation is comparable to that of a large family home, and there will be no significant impact on light, outlook, or privacy for adjoining residents.

To ensure responsible operation, a detailed Management Plan will be prepared and adhered to. This will include:

- 24-hour contact details for neighbours,
- clear refuse collection arrangements, and

- regular property inspections by the managing agent.

These controls, alongside HMO licensing requirements, provide a robust framework for ongoing management and accountability and will ensure that this scheme protects neighbour privacy, safety and rights to a peaceful life.

### **Waste, Refuse and Storage**

**Objection:** Eight people will create large volumes of waste; bins stored on the street will be unsightly or lead to vermin, affecting neighbour health and local environment.

**Response:** The proposal provides a purpose-built bin store on the front forecourt (for 4 wheelie bins) and a bike store, addressing waste and cycle needs in line with Policy T8. Unlike ad hoc bin placement, our design integrates refuse provision so bins are contained when not out for collection. Design guidance notes that refuse bins visible from the street should be housed in a well-designed enclosure. In practice, neighbours will see no more bins than before as any bins will be neatly stored, not left overflowing. Regular waste collection schedules will prevent long-term build-up. The development makes appropriate provision for storage of waste and bicycles, avoiding the nuisance described by objectors.

### **HMO Saturation and Community Impact**

**Objection:** Gillingham (and Park Avenue) has too many HMOs already – a “detrimental cluster”. Allowing two large HMOs side-by-side (up to 16 people total) will erode community character, destabilise neighbours, and set a bad precedent. Other recent HMO applications (Arethusa Centre, Stafford St, etc.) have been refused for being over-intensive. Property values may suffer.

**Response:** There are only 2no HMO’s located on Park Avenue, with the rest of the character of the street being single-family accommodation. The introduction of a third HMO does not therefore change the character of the area or result in an oversaturation of HMO’s as the overwhelming majority and character of Park Avenue will remain single-family accommodation.

Any concerns about property prices or social trends (beyond planning criteria) are not material planning considerations.

### **Management Plan and Mitigation Measures**

**Objection:** Neighbours doubt whether the HMO will be properly managed. They request guarantees (e.g. a contact person) and enforcement of any conditions to prevent ASB, noise, litter, etc.

**Response:** A robust management plan will be provided in due course and will be scrupulously followed. The HMO will be professionally managed by an experienced operator who will be responsible for tenant conduct. The management plan will include:

- 24-hour contact details for neighbours.
- clear refuse collection arrangements.
- regular property inspections by the managing agent.
- house rules to be followed. All occupants of the HMO will sign their agreements to follow the house rules in the tenancy. Eviction will be enforced for those who fail to follow the rules.

### **Conclusion**

All neighbour concerns have been carefully considered. The development is consistent with planning policy: Policy T8 (HMOs) is satisfied – the proposal preserves character and amenity, provides the required internal and external facilities, and avoids excessive parking. Policy DM10 (Conservation Areas) is satisfied – the house remains in use, no significant historic fabric is lost, and the changes respect the area’s character. National guidance supports keeping heritage buildings in active residential use. Taken together, the Planning Statement and supporting documents demonstrate that the points raised by neighbours are either already addressed by the design (e.g. waste/cycle provision, car-free design, amenity protection) or not substantiated. We therefore respectfully submit that the application should be approved with conditions, as it meets the requirements of the development plan and the NPPF without causing harm to local amenity or character.