

**GUIDANCE FOR PLANNING
APPLICATIONS FOR
HOUSES IN MULTIPLE
OCCUPATION (HMOS)**

**SUPPLEMENTARY
PLANNING DOCUMENT**

***ADOPTED
JUNE 2026***

PLANNING & PLACE, DBC

DARTFORD
BOROUGH COUNCIL

GUIDANCE FOR PLANNING APPLICATIONS FOR HOUSES IN MULTIPLE OCCUPATION (HMOS)

CONTENTS

1. Introduction.....	2
SPD Purpose, Implementation & HMOs.....	2
Types of Shared Accommodation	3
2. Growth of HMOs & Housing Pressures in Dartford	7
3. Applicable Local Plan & National Policy.....	9
National Planning Policy.....	9
The Dartford Plan (Adopted 2024)	9
4. SPD Policies for Considering HMOs	13
H1: Sustainable HMO Locations	14
H2: Unsuitable House Types.....	17
H3: HMO Over-Concentrations	19
H4: Amenity & HMO Accommodation Quality.....	21
H5: HMO Outside Space & Facilities.....	23
H6: HMO Vehicle & Cycle Parking Provision.....	25
Appendix	27
Plan Of Boundaries for the Immediate and Non-immediate Article 4 Direction	27

1. INTRODUCTION

- 1.1 This is a Supplementary Planning Document (SPD) produced by Dartford Borough Council. It focuses on Houses in Multiple Occupation (HMOs) and the issues to be taken into account when considering planning applications or enforcement of unlawful HMOs. An SPD provides detailed guidance on a topic or area, building on the policies contained in the adopted Dartford Plan to 2037. By law, the Dartford Plan is important as the starting point for making decisions on planning applications. Policies in the Dartford Plan can be reinforced by SPD.
- 1.2 This SPD was adopted by Dartford Borough Council on 25 June 2026 (after public consultation on a draft version April to May 2026). The SPD covers the whole of Dartford Borough, including the area of Ebbsfleet Garden City within Dartford Borough, where planning applications are considered by the Ebbsfleet Development Corporation (EDC). It will be used alongside the Dartford Plan and national policy to decide all planning applications for new or extended HMOs.
- 1.3 Please note that the SPD provides policies for use in planning decisions and does not impact on other regulations outside of planning legislation that HMOs need to satisfy. For example, HMOs will also need to meet certain health and safety, fire safety and amenity standards and may also need an HMO licence from the Council under national housing legislation. SPD policies do not apply to this licensing process under the Housing Act (although there is consistency in objectives for HMOs in the Borough).

SPD PURPOSE, IMPLEMENTATION & HMOS

- 1.4 The SPD guides residents, developers/landowners, decision-makers and others with practical advice as to how HMO planning proposals will be determined. Dartford's SPD policies will be a key influence, alongside the Dartford Plan to 2037, over whether the Council, EDC and other decision-takers, permit HMO developments.
- 1.5 Some of the following SPD policies are focused on development of a new HMO, but most of the provisions also apply to proposals to expand or alter an existing HMO where planning permission is required for that development. For all proposals, these policies will be a weighty material consideration (legally significant factor). This helps ensure a clear and consistent planning approach is taken to assessing HMO proposals.
- 1.6 Under planning law, a House in Multiple Occupation (HMOs) is generally treated to be a property *where tenanted living accommodation is occupied by persons as their only or main residence, who are not related, and who share one or more basic amenities*. There is currently a defined Use Class (C4) which is the use of a dwellinghouse as a small HMO with no more than six residents. More information of types of shared living, HMOs and Use Classes at the time of SPD adoption is provided below. However, it is important that the legislation and case law current at the time a proposal is considered is taken into account.
- 1.7 The Policy M10 (paragraph 5.100) of the Dartford Plan, that covers issues such as house conversions/garden land retention) anticipated supplementary policy may be necessary for residential proposals, which includes HMOs. This SPD addresses HMO related matters including:
- Acceptable locations in terms of sustainable development and suitable infrastructure;
 - When the clustering together of HMOs in a neighbourhood may be unacceptable;
 - Inappropriate loss of existing housing due to HMO proposals;
 - The impact and amenity of HMOs in the locality; and

- External and internal design and quality considerations for HMOs residents and existing surrounding local residents (for example issues including parking, bin storage and garden provision).

- 1.8 Supplementary policy to the Dartford Plan is required now as the number of HMOs proposed and developed in the Borough has significantly increased since the plan was originally drafted. There is evidence that cumulative impacts in some neighbourhoods are having wider and more severe consequences¹. Planning applications are expected to increase further as the Council has introduced Article 4 Directions². These result in all proposed HMOs (whether small or large) needing to apply for planning permission.
- 1.9 Until recently across the Borough the change of use of a flat or house to a Class C4 HMO for up to 6 occupants (referred to as a small HMO) had a nationally deemed planning permission ('permitted development'). Conversions to HMOs with more than six occupants (referred to as large HMOs) already required planning permission. The new rules under Article 4 directions in Dartford have removed that right³. Every proposal for a new HMO within the Borough will require planning permission. See Appendix A for the boundary plans showing the Article 4 Direction areas.

TYPES OF SHARED ACCOMMODATION

- 1.10 There are many types of shared living accommodation which under planning law may not be treated as HMOs or may be considered as a different type of sui generis use and not called an HMO for planning purposes. The proposal may instead be considered as falling within one of the newer models of shared living accommodation emerging or indeed rooms could in fact be considered as self-contained studio flats, bedsits or a hostel. Some of the different types of multi-occupancy residential accommodation are set out below.
- 1.11 If the proposed use is not considered to be an HMO, policies in this SPD will not apply directly but along with the Local Plan, they may provide useful guiding principles to allow the Council to apply a consistent approach to shared accommodation where planning permission is required.

Larger Scale shared living accommodation

- 1.12 The draft NPPF 2025 provides a new definition for Large-scale shared living accommodation:
- Non-self-contained accommodation which provides private rooms alongside shared communal spaces and facilities. This type of accommodation does not constitute self-contained dwellings (use class C3), HMOs, student accommodation, hotels, or other residential institutions. Tenancies should be for a minimum of 3 months.*

¹ Dartford Borough Council, Supporting evidence for the draft supplementary planning document: Guidance for the planning of houses in multiple occupation (HMOs), 2026

² At the time of producing this document it is not yet applicable in the southern part of the Borough, but will be from 10th December 2026

³ However, C3(b) and C3(c) uses may fall within the definition of an HMO under the Housing Act 2004 and therefore may be subject to requirements outside of planning legislation.

Class C3 dwelling houses: shared accommodation

1.13 Use Class C3 (The Town and Country Planning (Use Classes) Order 1987 as amended)⁴: Dwelling houses

Use as a dwellinghouse (whether or not as a sole or main residence) by—

- a) a single person or by people to be regarded as forming a single household;*
- b) not more than six residents living together as a single household where care is provided for residents; or*
- c) not more than six residents living together as a single household where no care is provided to residents (other than a use within Class C4).*

1.14 (The term dwelling house in planning includes a self-contained flat in respect of the Use Classes Order.)

Use Class C4: use of a dwellinghouse as an HMO

1.15 Use Class C4 (The Town and Country Planning (Use Classes) Order 1987 as amended)⁵. Houses in multiple occupation:

Use of a dwellinghouse by not more than six residents as a “house in multiple occupation”.

Interpretation of Class C4

For the purposes of Class C4 a “house in multiple occupation” does not include a converted block of flats to which section 257 of the Housing Act 2004 applies but otherwise has the same meaning as in section 254 of the Housing Act 2004⁶

This Use Class was introduced by the 2010 amendment to the Use Classes Order and an explanatory note to this amendment summarised an HMO as "In broad terms, this use occurs where tenanted living accommodation is occupied by persons as their only or main residence, who are not related, and who share one or more basic amenities".

Sub-section 257 (2)(f) of the 2004 Act requires an HMO to contain two or more households occupying living accommodation and sharing one or more basic amenities such as a toilet, personal washing facilities or cooking facilities.

Class C3 or C4?

1.16 The consideration of whether a dwelling is a shared house under Class C3 (b) or (c) or constitutes a Use Class C4 HMO requiring planning permission is a matter of fact and degree. The following are some of the factors that the Council will consider in reaching a decision on whether a use falls under C3 or C4, these do not exclude other factors also being considered where appropriate:

- Whether the persons living in the house came to it as a single group or whether they were independently recruited;
- What facilities are shared;
- Whether there is communal living taking place;
- Whether the occupants are responsible for the whole house or just their particular rooms;
- Whether individual tenants are able to lock other occupiers out of their rooms;

⁴ Secretary of State for the Environment, The Town and Country Planning (Use Classes) Order 1987

⁵ Dartford Borough Council, Evidence for a direction(s) under Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) relating to Houses in Multiple Occupation, 2025

⁶ Housing Act 2004, Section 254

- Whose responsibility it was to recruit new occupiers when individuals left; who allocated rooms;
- The size of the property;
- How stable the group composition is;
- How the property maintenance is managed, e.g. Who puts the rubbish out, cleaning etc;
- How bills are split/shared.

Houses in Multiple Occupation (Sui Generis uses)

- 1.17 HMOs which have more than 6 occupants or are not converted from existing Class C3 dwellinghouses are considered to fall outside of a defined use class and are known as a *Sui Generis* use.
- 1.18 The Council will generally consider whether the use is an HMO or not by using the definition set out in section 254 of the Housing Act 2004 as referred to under use class C4 above.
- 1.19 Where HMOs are converted from commercial buildings the applicant will need to demonstrate that the conversion is to a property where basic amenities for residential living are provided and shared and it is not a collection of self-contained units. Such a conversion may also fall to be considered as a larger scale shared living accommodation.

Self-contained dwellinghouses Use Class C3 or HMO?

- 1.20 Considering whether a unit of accommodation constitutes a self-contained dwellinghouse under Use Class C3 is a matter of fact and degree. If units of accommodation within a property are self-contained, they cannot be defined as an HMO. As can be seen above the definition of an HMO requires some sharing of basic facilities or for the units of accommodation to not have all necessary facilities for self-contained living.
- 1.21 The Council will take account of evolving case law when considering whether the accommodation is an HMO or a collection of self-contained living units. Planning legislation in England now uses the definition of an HMO set out in section 254 of the Housing Act 2004, which essentially defines a house in multiple occupation as two or more households who share basic living accommodation. A dwellinghouse use is defined by the Town and Country Planning Use Classes Order as a person or persons living together as a single household.
- 1.22 The following are some of the factors that will be considered by the Council in determining whether units within a proposed HMO actually fall to be considered as conversion to self-contained units:
- 1.23 A room in a building will be considered a self-contained unit rather than a room in an HMO where all of the following apply:
- It has its own secure entrance, which is not accessible by others in the building;
 - It has its own bathroom/shower room facilities;
 - It has its own kitchen facilities including a fridge and cooking facilities.
- 1.24 The following might also indicate that the unit of accommodation is self-contained as opposed to an HMO room:
- There is a lack of communal bathroom facilities in the property;
 - The communal facilities in the property do not provide any additionality to the facilities in the room with the exception of laundry facilities and storage space (provision of a shared laundry room and storage space is not unusual in a small block of flats);

- The “communal kitchen” does not provide maintained and useable cooking, laundry and fridge/freezer facilities;
- The external amenity space is not accessible by all of the HMO residents;
- The kitchen is not large enough for a dining table/eating space;
- There is no internal communal space other than a small kitchen, utility or laundry room;
- Room sizes – if a large bedroom then more likely to be self-contained, especially if combined with a lack of internal communal spaces.

1.25 The occupation of the unit of accommodation(room) is “akin to occupation by a single household” which is indicated by the following:

- It has separate utility bills to other units of accommodation in the building;
- There are no shared bills other than communal maintenance;
- There is separate Council tax billing for the unit;
- A separate street naming and numbering record has been set up;
- There is separate waste provision for the unit;
- The nature of the tenancy agreement.

2. GROWTH OF HMOS & HOUSING PRESSURES IN DARTFORD

- 2.1 Dartford Borough has a fast-growing population, and an acceleration of residential intensification from conversions of properties particularly to HMO use.
- 2.2 Like much of the country, Dartford is facing housing cost pressures. The cost of buying a house in Dartford has more than doubled in the 20 years to 2024 and private housing rents in Dartford are also above average both nationally and in the South East. These factors will contribute to pressure on local housing stock and supports continued active planning and targeting of appropriate residential development.
- 2.3 Dartford has hosted some very high levels of new home construction. The Dartford Plan seeks for private developments to contribute to a suitable mix including directly contributing to affordable housing provision that is of appropriate tenure relevant to local requirements, properly managed and maintained, and focused on residents in the most acute need. The Council is seeking to address genuine local housing need and prioritise the provision of quality new affordable housing to meet priority requirements; and the Council is itself constructing good quality affordable housing. In contrast, HMOs do not provide affordable housing that meets the definition of affordable housing (and HMO developments commonly do not support the Borough's overall new housing targets).
- 2.4 At a borough-wide scale, planning policy can also guard against a switch towards using significant parts of the local housing stock for one particular type of accommodation resulting in harms which could jeopardise Dartford's social, economic and environmental objectives, and harm the health and well-being of all residents.
- 2.5 A varied stock of accommodation provides residents with a range of different housing typologies, tenancies and costs to support various housing needs, living situations and preferences. Groups such as young adults leaving the family home/ starting employment or some of the growing number of single person households are usually reliant on market rented housing which includes HMOs. There has always been a need for guidance and management of this accommodation to maintain a suitable housing stock in a locality.
- 2.6 The need for accommodation at reasonable rents does not diminish the need for action to ensure quality is sufficient and buildings provide decent living space for occupants. The planning system can help complement requirements of housing legislation in this respect, and this SPD has been produced to work alongside and support but not duplicate other regulation of accommodation.
- 2.7 Dartford is the most densely populated borough in Kent and further projected population growth will increase density further. There are strong indications of significant increases in HMOs in recent years, notably since the 2021 census¹. Evidence in Dartford is that the recent acceleration of HMOs has been most pronounced in areas with high population densities, for example in the largely residential areas and older houses surrounding Dartford town centre. Data indicates a tendency for these neighbourhoods to suffer some of the worse incidences of noise complaints, parking stress and crime reports, for example. It is important to ensure that the impact of HMOs on neighbours and neighbourhoods is carefully considered.

2.8 Evidence originally presented in support of adopting Article 4 Directions and updated to manage proposed HMOs¹ shows in summary:

- There has recently been an evidenced substantial acceleration in identified HMOs. The recorded number of HMOs are only part of the increase within the Borough as other HMOs have occurred without advance notification (which could legally occur).
- The identified growth of HMOs has principally been clustered within certain geographic locations. HMOs have mostly been in locations with already higher than average concentrations of housing and residents, many of which face socio-economic or local environmental pressures.
- Data indicates that issues in these densely populated neighbourhoods often include crime, noise complaints, on street parking stress, and multiple deprivation factors, and are therefore prone to more severe adverse impacts from any further insensitive residential intensification
- Further issues arise in terms of infrastructure and service provision as HMO development is not planned for or anticipated in planning and infrastructure strategy: any new HMOs are additional to new development identified to come forward and are therefore unsupported by the Dartford Plan and planned infrastructure improvements. For example, with unexpected population growth, oversubscribed public services may result for everyone in the locality.
- Also an expansion of a more transitional local population, only resident for a relatively short time, can affect the environment, reduce the sense of community and social cohesion. There could possibly be less focus by occupants or landlords on building relationships, and investing time and effort to maintaining the quality and appearance of houses and the local neighbourhood than some other areas.

2.9 There are clear grounds for concern over the risk that further acceleration and concentration of HMO development pose, especially where not improving the quality of housing stock and local environment. With the prospect of a major increase in HMOs continuing, data suggests careful consideration is needed in terms of: acceptability of the proposed HMO location; the extent of HMOs already in the locality; local infrastructure; the suitability and type of the dwelling for conversion to HMO; the design and quality of the proposal, and other local impacts.

3. APPLICABLE LOCAL PLAN & NATIONAL POLICY

NATIONAL PLANNING POLICY

- 3.1 National planning policy seeks sustainable development, noting there are economic, environmental and social and objectives. These are intended to be addressed through a plan led system, based on proposals being decided primarily by applying principles in the Dartford Plan. Current national policy is mainly set out in the National Planning Policy Framework (NPPF) December 2024.
- 3.2 National policy has a strong focus on the quantity, type and design of housing accommodation developed, and recognising the needs of different groups and residents. Paragraph 96 of the NPPF “aim[s] to achieve healthy, inclusive and safe places” with:
- Social interaction
 - Safe and accessible places, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion
 - Healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs.
- 3.3 Paragraph 135 states development should “function well and add to the overall quality of the area” and “create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

THE DARTFORD PLAN (ADOPTED 2024)

- 3.4 The Local Plan in the Borough is the Dartford Plan to 2037, adopted 2024. The Dartford Plan contains the primary statutory policies applying to planning applications in the Borough. It contains a range of policies controlling the location and type of development in Dartford. A number of these apply to HMOs and residential proposals, albeit not exclusively focused on HMOs alone.
- 3.5 The Dartford Plan remains the starting point for consideration of planning applications. However, SPDs and the NPPF are significant material considerations, that can be factored in additional to Dartford Plan policy. The reasoned justification (supporting text) for each of the guidelines in this SPD outline the many policies in the Dartford Plan from which requirements for HMOs flow.

Plan Strategy (overarching policy and objectives)

- 3.6 Strategic policies are set out in Chapter 2 of the Dartford Plan. The first three objectives (W1-W3) concern community wellbeing and are relevant here:

W1. Achieving cohesive, safe, walkable and attractive neighbourhoods, with a real sense of place and vitality that reflects the area’s heritage and potential, and whose residents enjoy a choice of homes suited to their needs and easy access to local everyday facilities, including education and healthcare.

W2. Improving health and wellbeing, and air quality arising from congestion, through reducing the need to travel by private vehicle, particularly by retaining and providing jobs, services, shops, community facilities and open space at suitable locations close to residential areas and where good public transport services are within easy walking distance.

W3. Providing well-designed new housing that is genuinely mixed, affordable and of varied tenure, sustainable, and promotes healthy living, to secure the quality of life of residents and the ability for them to continue residing at their home or within the Borough.

- 3.7 Therefore, in terms of maintaining well-being, HMOs and other development should aim for easy access to local facilities, a location with good public transport, be well designed and healthy, and part of a mix of housing which secures quality of life for residents. Policy S1 of the Plan establishes the fundamental principles about where any development should occur:

Policy S1: Borough Spatial Strategy

1. *Sustainable development will occur at planned locations in the Borough to meet assessed needs, securing new infrastructure provision and brownfield land re-use, creating neighbourhoods resilient and adaptive to climate change. Development should provide a diverse and complementary balance of uses and services within settlements, and minimise the necessity to travel by private vehicles.*
2. *Growth will be located at strategic allocations, sites in the identified housing land supply, and in line with the economic strategy. Development is directed to:*
 - a. *Brownfield land not within the Green Belt; and*
 - b. *Sites with good access by public transport and walking/cycling to a range of local supporting services/infrastructure.*
3. *The overriding priority for development in the Borough is at:*
 - a. *Central Dartford; and*
 - b. *Ebbsfleet Garden City These growth locations will be regenerated with the provision of new and improved infrastructure and strategic mixed use development.*

- 3.8 Dartford strategic policies have a very clear focus on the appropriate location of residential development. In Policy S1, parts 1 and 2, and Policy S5 on Sustainable Housing Locations (part 1) development is directed towards 'planned locations' and/or 'sites in the identified housing land supply'. The principle is established from the outset that development should be as pre-identified and at locations as per the Dartford Plan.

- 3.9 Under policy S5 the policy is for residential development to show benefits outweigh the disbenefits, including taking account of the location's sustainability (unless sited in/around Dartford town centre i.e. the defined Central Dartford area, or at Ebbsfleet) applies. As HMOs can often be an intense form of land-use, with multiple residents in one house, their location should take particular account of the sustainability and environmental impacts.

Plan Strategy (Central Dartford & Ebbsfleet and Swanscombe)

- 3.10 In Chapter 3 of the Dartford Plan (Central Dartford) several important requirements are set out for this specific area, including:

Policy D2: Central Dartford Development Principles

1. *Development proposals in Dartford should:*
 - c. *Support the creation of a neighbourhood community with a mix of residential types and tenures.*
 - d. *Ensure integration of the scheme into the wider setting and movement patterns, including creating safe public open spaces and/or new pedestrian friendly streets. The sense of security of spaces and streets must be ensured, including for converted or extended*

buildings where features such as providing front doors onto safe spaces and streets are expected.

3.11 The same chapter also sets out Policy D3:

Policy D3: Central Dartford Mix of Uses

2. *It is expected that residential development will occur in Central Dartford principally through:*
 - a. *Allocations identified in policies D4, D5, D6, and D7;*
 - b. *High quality conversion/extension of upper floors or under-used buildings; and*
 - c. *New residential developments in the housing land supply, located in accordance with Policy D7, or additional sites demonstrated to be suitable under D2 and other policies.*

3.12 Chapter 4 of the Dartford Plan (Ebbsfleet and Swanscombe) also outlines:

Policy E2: Ebbsfleet Garden City Development Principles

1. *Development proposals in Ebbsfleet Garden City should:*
 - a. *Offer a genuine variety of types and tenures of homes that allows people from all communities to live in the area;*

3.13 Chapter 4 also features a specific policy at Swanscombe, a town that - whilst encircled by the Garden City - has very distinct needs of its own, with the requirements established in its own focused policy. This is provided in full here:

Policy E3: Swanscombe

1. *Swanscombe will retain and improve its distinct identity and positive characteristics, including the popular residential core, generous sized open spaces and approaches, and the local High Street.*
2. *The Following will apply:*
 - a. *Facilities, including at the well-established High Street District Centre and other locations within Swanscombe will be retained/ improved;*
 - b. *Environmental and infrastructure enhancements, including to upgrade public transport and walking and cycling connections, will be sought; and*
 - c. *Existing single family dwellings will be retained, and proportionate redevelopment for new family homes will be supported at small brownfield sites.*

3.14 In summary, specific policies are provided for many different parts of the Borough, complementing Policies S1 to S5. In Central Dartford, the issue of quality and safety of all forms of development is pivotal and will be a primary consideration in any HMO proposal. Key sites in Central Dartford are covered by detailed individual proposals, namely the areas in policies D4 to D6, where substantial new build development is proposed for specific uses not including HMOs (which will be resisted accordingly as contrary to devoted site allocation policy).

3.15 Similarly, HMO uses are not planned for in Ebbsfleet Garden City or in Swanscombe. At Swanscombe, as well as impacts from Ebbsfleet, it faces challenges including a particular shortage of family sized accommodation and therefore Dartford Plan policy means HMO proposals would generally be inappropriate.

Plan Development Management (Topic) Policies

- 3.16 Chapter 5 of the Dartford Plan provides Borough-wide policies with additional criteria on issues such as design/density, air quality, water efficiency, amenity space and conservation.
- 3.17 For example, the first part of Policy M10 requires: “Development must maintain a range of dwelling sizes and sufficient garden land, retain or enhance the character, local environment and amenity of established residential areas, and achieve satisfactory quality of development.”
- 3.18 Criterion 2 of the policy states development resulting in unacceptable loss of garden land will be refused, and harm must not result individually or cumulatively from loss of diversity of the housing stock in the borough or erosion of local character.
- 3.19 Other parts of the Policy M10 and associated text note particular issues with changes to terraced homes for instance. And specific potential impacts of developments are noted including additional noise, increased activity and more refuse and recycling bins kept on street to serve the individual households.
- 3.20 Further borough-wide development management policies in the Dartford Plan provide additional criteria when considering planning applications for HMOs including design/density, air quality, water efficiency, garden/ amenity space and conservation. Policy M15 seeks to prevent excessive pressure for on-street parking and Policy M16 addresses off-street parking requirements, amongst other transport considerations.
- 3.21 Therefore, several detailed management policies in the Dartford Plan may apply to HMOs and other proposals; many are addressed directly through the following policies. It remains necessary to consider all policies in the Dartford Plan that may be relevant, in addition to using this SPD.

4. SPD POLICIES FOR CONSIDERING HMOS

- 4.1 Six SPD policies for HMO-related planning applications are set out below and will be used for the purposes of decision-making for HMO applications, alongside the relevant policies within the Dartford Plan to 2037.
- 4.2 Each is followed by reasoned justification paragraphs: supporting text that helps explain and apply the policy.
- 4.3 A range of other local and national planning policies are likely to apply, including policies not just on HMOs (such as on housing, transport and infrastructure, residential amenity, conservation and the wider environment). These should be taken into account as appropriate.

H1: SUSTAINABLE HMO LOCATIONS

HMO development should demonstrate benefits outweigh dis-benefits, based on the Dartford Plan and other policies, applying clauses 1 and 2 below (and the rest of this SPD):

- 1) **Assessment of impact will take into consideration that proposals have not been accounted for in infrastructure planning or the sustainable level of development identified in the Dartford Plan for the Borough. It is essential that development should be located sustainably with supporting infrastructure available as applicable to the scale of the proposal, therefore:**
 - a) **HMOs with more than 6 occupants should be located within a 800-metre safe, green and convenient walking distance of a convenience store or designated retail centre, and a GP surgery or hospital; and within an 400-metre safe, green and convenient walking distance of a railway station or bus/ stop.**
 - b) **HMO developments for 10 or more occupants will be resisted unless specifically demonstrated to have acceptable impacts on the settlement, local neighbourhood and infrastructure. In any event, development of this scale in a village or outside a settlement is unlikely to be acceptable due to harmful impacts associated with larger scale developments in these areas.**
 - 2) **HMO developments should accord with the Dartford Plan's Borough spatial strategy S1 and with the following criteria for proposals in locations a) to c), so as to clearly to address the specific needs of towns and the locality:**
 - a) **In Central Dartford, any new or intensified HMO must show how it has been designed to a high quality (particularly in respect of ensuring safe resident/ pedestrian access and designing out crime as well as mitigation of impacts on amenity from any commercial uses below) and positively contributing to a secure neighbourhood community with a suitable mix of residential types, as part of demonstrating if benefits may outweigh dis-benefits.**
 - b) **In Ebbsfleet Garden City, any new or intensified HMO must contribute to the variety of housing stock for all communities, including through supporting the accommodation needs of employees in the Borough.**
 - c) **In Swanscombe, the loss of a family dwelling is a substantial dis-benefit.**
- 4.4 H1 applies the Dartford Plan's strategic approach to location, infrastructure and sustainable development when assessing the location of HMOs. It comes from policy S1 on the spatial strategy for the Borough (e.g. H1 1b) and clause 1a above draws from the Dartford Plan policy S5 parts 2b and 2c.
- 4.5 HMOs can result in a more intensive form of residential occupation compared to family dwellings, arising as unplanned windfall proposals. Therefore, new HMOs and proposals that materially increase the number of HMO occupants should be assessed against whether the benefits of the development outweigh the dis-benefits when evaluated against the Dartford Plan and national policy; and with additional criteria depending on location, size and impact. The threshold of 6 or more occupants reflects the national definition of small and large HMOs.
- 4.6 HMOs are not part of the plan-led housing supply and are therefore not considered in infrastructure planning in the same way as housing allocations for example. Dartford Plan Policy S2 requires development to be co-ordinated with existing and new infrastructure and located where communities have good quality and sustainable access to day-to-day facilities, jobs and public transport. Clause 2

of H1 above ensures that increased HMO occupation is considered alongside the anticipated demand it may place on local services and infrastructure.

- 4.7 Unanticipated population and infrastructure demand from HMOs may not be addressed by service providers, risking the exacerbation of existing infrastructure problems. HMOs nearly always arise through conversions, creating intensified use of existing dwellings or conversion of properties in other uses cumulatively within the urban fabric. The resulting extra population growth is unlikely to benefit from capacity made available for planned development – stretching services for everyone.
- 4.8 Borough wide, the Dartford Plan places emphasis on development being located where there is good access by public transport and walking/ cycling to a range of local supporting services and infrastructure (Policy S1, parts 2 and 3). HMO development in less accessible areas is unlikely to accord with the planned spatial strategy and may introduce a disproportionate level of residential intensification and vehicle use. National policy may also attach weight against unsuitable development in such areas.
- 4.9 Readily walkable proximity to a range of community facilities is necessary and must be along a highly usable and good quality route. Locating development with reference to the walking distances to services and public transport in 1(a) above promotes choice of transport. Consideration should also be given to Dartford's Settlements & Sustainable Locations SPD⁷. In some instances, developments may be able to address issues i.e. supporting the enhancement of walking and cycling routes to ensure the sustainable operation of larger HMOs. Improvements should help deliver the Dartford LCWIP and subsequent initiatives and requirements as set out by the local planning and transport authorities (DBC/EDC and KCC).
- 4.10 Policies S1(11) and S5(2) of the Dartford Plan set out the need for development within the Borough's villages to be of proportionate scale and on non-Green Belt land. Clause 1(b) above applies this approach by recognising that HMO proposals for 10 or more residents within a village setting are unlikely to be proportionate, having regard to the scale and intensity of occupation, trip generation and the likely effects on local character, amenity and infrastructure. Proposals must accord with the Borough's spatial strategy and not give rise to unacceptable impacts consistent with Policies S2 and M16 of the adopted Plan.
- 4.11 Clause 2(a) above expresses policies D2 and D3 of the Dartford Plan, which support a mixed and well-functioning Town Centre, with a range of residential types and tenures and high-quality development that integrates with existing movement patterns and local services. Clause 2(a) also reflects policy D2(1)(d) of the Dartford Plan, which requires development in Central Dartford to integrate with the wider setting and movement patterns, create safe public spaces and pedestrian friendly streets. In Central Dartford proposal should meet the regeneration strategy outlined in policy D1, and positively contribute to housing choice, design quality and neighbourhood function. One key part of considering if the community would have a 'suitable' mix of residential types is through examining surrounding streets, and ensuring residential properties in the area are not already largely made up of HMOs, or large-scale conversions to small flats.
- 4.12 Applicants should ensure that the proposal explains how it has been designed to a high standard, broadens the range of accommodation available and supports the creation of a mixed, safe and sustainable neighbourhood community. Proposals should demonstrate a high standard of design in relation to safe and convenient access, natural surveillance, appropriate window placement and

⁷ Dartford Borough Council, Settlements & Sustainable Locations Supplementary Planning Document, 2026

outlook for occupants. The sense of security of spaces and streets must also be maintained, including in the case of conversions/ extensions to existing buildings.

- 4.13 Ebbsfleet Garden City is a planned growth location, with Policy E2 of the Dartford Plan setting out how to apply specific principles of development within the area. Proposals for HMOs in this area are not anticipated and must demonstrate that they provide an appropriate form of housing variety and do not undermine the strategy and design vision set for the Garden City (through Policy E1 of the Dartford Plan, for instance). In applying H1 clause 2(b), regard should also be had to Policy E2, clause 1(a) of the Dartford Plan, which supports a variety of housing stock for all communities, including to assist in meeting the needs of employees in the Borough. The form and quality of HMOs and shared accommodation should be aimed at the local workforce given the proximity of major employment destinations in the north of the Borough, including identified employment areas and large service employers.
- 4.14 Policy E3 of the Dartford Plan seeks to retain and improve Swanscombe's distinct identity and existing single-family dwellings should be retained. When applying clause 2(c) above, the Council will attach significant weight against proposals that would convert a family sized house i.e. with two or three bedrooms (under the Dartford Plan this is additional to properties within the specific definition addressing the SPD next policy). The applicable area is land encircled by (but not within) the EDC's administrative area, as shown on Diagram 10 of the Dartford Plan.

H2: UNSUITABLE HOUSE TYPES

HMO development should not occur at an inappropriately sized or type of house unsuitable for intensification, or result in loss of a dwelling from essential housing stock. This requires:

- 1. All proposed HMO conversions should be at appropriate properties to avoid unacceptable impacts. Changes of use of mid terraced properties, and properties under 120sqm, to HMOs are unlikely to be acceptable.**
 - 2. Proposals creating a new HMO through the conversion of a two or three-bedroom house where there is a school within an 800m walking distance will be regarded as a substantial dis-benefit and are likely to be resisted accordingly.**
- 4.15 H2 provides guidelines on whether the host dwelling is of a type likely to be unsuitable for HMO use and how proposals will be assessed where they affect the Borough's housing stock. It supports policies in the Dartford Plan for development management and Policy S1 by supporting the Borough's economic strategy and social objectives, ensuring key family home stock is not eroded by ad-hoc HMO proposals. The approach is also supported by evidence that harm to amenity is occurring from HMO growth in neighbourhoods in Dartford with a concentration of terraced properties or with a high density of mostly small houses. Some neighbourhoods in Dartford are largely characterised by terraced housing stock (for example the proportions in Newtown and Swanscombe recorded in the last census amount to 56.5% and 49.4% respectively.)
- 4.16 There are also particular concerns over unplanned changes in the use of Borough housing stock. Properties that are able to accommodate medium sized households (two or three bedroom properties) and those with children are important to maintaining the Borough as an increasingly prosperous area with an active labour force supporting business, and sustaining Dartford's good quality schools. These households laying down roots in the area also contribute to the social fabric of neighbourhoods.
- 4.17 Clause 1 above identifies some house types are typically unsuitable for HMO conversion because of their layout and fundamental characteristics. This reflects Policy M10, clause 4 of the Dartford Plan, which addresses the conversion of smaller dwellinghouses, including single dwellinghouses of 120sqm or less. Features such as the proximity of neighbours, and constrained access arrangements, and limited accessible space for necessary storage, mean they are unable to deliver usable or acceptable living arrangements for HMO residents or neighbours. For instance, mid-terraces (i.e. any terraced property other than those at the end of the terrace) and other small dwellings often cannot mitigate noise and nuisance felt by residential neighbours of HMO, and are typically unable to provide necessary provision for refuse/recycling and vehicle parking/ bicycle storage generated by an HMO, acceptably within the street scene. It can lead to direct and adverse impacts on neighbours and erosion of residential character, potentially blighting a street or locality.
- 4.18 Given the outcomes that can be expected at unsuitable houses, this stock is inappropriate 'in principle' for HMO or expansions. Policy M10's final sentence states: 'The conversion of terraced houses will not be permitted unless demonstrated to result in beneficial outcomes for both townscape character and residential amenity of both new and existing surrounding residents.'
- 4.19 Conversely, in some cases, there may be fewer disadvantages in terms of local amenity impact where a proposal relates to a detached dwelling, or where both properties in a semi-detached pair are in an HMO use or are proposed to be converted. This is because such arrangements may reduce some direct impacts on adjoining single-family dwellings, particularly in relation to noise transmission and

the intensification of day-to-day activities. However, this does not indicate that such properties are suitable in all cases, and clause 2 of this policy may apply.

- 4.20 There has been particular pressure in some accessible and relatively affordable areas for current houses highly suitable and demanded by local households (especially those with school-age children) to be targeted for conversion and extension into HMOs. Consequential impacts on the loss of this important stock, and on groups such as parents with children and some first-time buyers justify the requirements of clause 2.
- 4.21 The conversion of family housing due to HMO pressures in a neighbourhood must not individually or cumulatively deplete the homes necessary to meet Borough needs and retain an appropriate diversity of residential accommodation in a locality. To ensure a focus on those properties most relevant to essential household needs, for the purposes of this policy the **homes to be protected under H2 clause 2 are:**
- a. Any two or three-bedroom house (unless under 70sqm GIA in size), where also:
 - b. Located within a reasonable and convenient walking distance of a school (an actual and suitable walking route of 800m or less: a specifically confirmed route, not measured 'as the crow flies').
- 4.22 This reflects the importance of retaining housing stock suitable for families with children, and for them to have convenient and sustainable access to education. Note, if a property under consideration as an HMO is more than 800m measured directly from any school, then it cannot be regarded as a protected family home. In this context, 'school' means all mainstream primary and secondary schools.
- 4.23 In the event an existing two or three-bedroom house is already under 70 sqm GIA it would not compare favourably with Nationally Described Space Standards (Dartford Plan policy M1 part 3c) minimum sizes. It would be considered too small to be a family home to specifically protect on those grounds from an appropriate alternative use.
- 4.24 The housing need evidence⁸ base for the Dartford Plan found that across a range of tenures including market housing (which incorporates private renting such as HMOs) the greatest demand over the plan period is for three bedroomed properties, and two bedroom property demand also significant, with the lowest requirement being for one-bedroom dwellings (see Dartford Plan Figure 11).
- 4.25 Dartford is distinctive in becoming an increasingly popular area for families, with a decreasing average age in the Borough (the only authority in the region in the last census). This supports high levels of employment and the steady transition in the performance of the Borough's economy, which need to be maintained. The census (2021) showed the average age of a Borough resident was 37.4 years, compared to 41.6 years in Kent as a whole. Furthermore, Dartford has been one of the fastest growing areas nationally in increases in the child age population. The greater proportion of people in their 30s and 40s than average for a Kent local authority is consistent with the high demand for two bedroom and especially three-bedroom family houses. Avoiding these properties also recognises the potential issues of poor-quality accommodation arising where developments seek to use smaller existing properties for new HMOs.

⁸ HDH Planning and Development and Dartford Borough Council, Dartford and Ebbsfleet Housing Needs Assessment, 2019

H3: HMO OVER-CONCENTRATIONS

HMO developments should not result in an over-concentration of HMOs, including where:

- 1. Development creates a new HMO where a total of 10% or more of residential dwellings within a 50m radius from the proposal site, exist or result as HMOs; or**
 - 2. Development results in any single Class C3 dwellinghouse being ‘sandwiched’ between two or more HMOs on that same street, or**
 - 3. Development to extend or intensify an existing HMO located in a ‘run’ of three or more HMOs (i.e. adjacent continuously in the street).**
- 4.26 The Dartford Plan seeks well-functioning, and mixed communities. Development proposals should avoid creating or contributing to an overconcentration of HMOs, informed by local evidence of clustered HMO growth and consistent with the Dartford Plan’s objectives on amenity protection and housing stock reflected in Policies M1 (Good Design for Dartford), M2 (Environmental and Amenity Protection) and M8 (Housing Mix).
- 4.27 Evidence produced by the Council records a further acceleration in proposed HMOs since the adoption of the Dartford Plan in 2024. Additional planning controls and guidance are necessary to ensure clear and effective consideration of proposals by the local planning authority to manage the cumulative effect on residential areas within the Borough.
- 4.28 The criteria above focus on overconcentration: where local areas are at or would go over a point where the amount of HMOs would saturate the neighbourhood. HMO proposals have tended to cluster on certain localities, partly due to conversion of particular types of housing stock. This has resulted in unacceptable impacts, with multiple HMOs in close proximity generating high levels of activity, disturbance, refuse and parking stress, often in already dense residential areas with high infrastructure demand.
- 4.29 When applying Policy H3, Dartford Borough Council will only take into account HMOs that are known to be lawful and evidenced as such. This includes HMOs that are licensed where required, along with HMOs that otherwise have planning permission or have been confirmed as lawful by the Council. (Alleged, unlicensed or unverified HMOs cannot be counted for the purposes of assessing overconcentration).
- 4.30 To identify when an over-concentration is occurring, H3 clause 1 applies a percentage threshold within a defined radius of the application site. This is about cumulative impacts in the wider area; and provides a practical indicator for over-saturation within a neighbourhood level to prevent an adverse overconcentration of HMOs. The percentage threshold is set at a level which will not prevent some additional HMOs in most areas from the current level, but will be effective in preventing excessive new proposals from clustering in any one area.
- 4.31 Properties will be counted using the mapped centre point of each residential property. This means the radius is measured from the centre of the application property; properties which are all or only partially covered by a 50m radius should be included when calculating the 10% threshold. Where a building contains multiple self-contained addresses (i.e. a block of flats), each residential address point counts as one property when calculating the overconcentration percentage. This criterion will be applied for proposals to extend an existing HMO, if the threshold is already breached, alongside other SPD policies to ensure any cumulative impacts are addressed.

- 4.32 Safeguards in the event of highly localised unacceptable impacts for neighbours on a particular street are also required. Clause 2 recognises that material harm may result where an existing dwelling is “sandwiched” between HMOs. Clause 3 avoids creating a run of three HMOs in succession even where there are limited breaks in the building line. This also applies for HMO expansion proposals where intensifying issues through development at a property already part of an over concentrated run of HMOs. It includes both physical expansion of an existing building and internal works resulting in additional HMO bedrooms or increased occupation.
- 4.33 The site boundary should be used to assess property adjacency. A two vehicle width public highway gap is likely to be regarded as non-adjacent, but moderate breaks in the building line of streets (including narrow roads, access tracks, or private drives within the curtilage of a property) will ordinarily be accepted as a standard feature of adjacent properties.

H4: AMENITY & HMO ACCOMODATION QUALITY

HMO development should demonstrate careful consideration to internal layout and design, ensuring quality of life of HMO residents and neighbours, respecting the need for privacy, avoiding noise, intrusion and disturbance. Development should also:

- 1. Provide suitable quality accommodation for the well-being of all occupants. All rooms should be of a sufficient size to meet the needs of occupants and all HMOs should include shared basic amenities that are of an appropriate quality and layout to accommodate the number of HMO occupants.**
 - 2. Ensure conversion of the building would not result in occupied rooms adjacent to bedrooms in neighbouring attached properties. Where this occurs in close proximity, or if communal rooms or circulation areas (including stairwells) share a party wall with a bedroom at first floor and above in a neighbouring property in use as a single dwellinghouse, the proposal will be resisted unless adequate noise mitigation is evidenced.**
 - 3. Be designed to support the privacy and amenity of residents of the HMO through the use of noise insulation measures between rooms, such insulation to be required as part of the planning permission where this is beyond normal Building Regulation requirements.**
- 4.34 H4 gives effect to the Dartford Plan's (Policies M1 and M2) requirement for development to be well designed and achieve a high standard of amenity for both occupants and neighbours, providing effective mitigation where necessary. Consistent with clause 1 above, regard may be to the Council's licensing 'Guidance to HMO Amenity Standards' where necessary for planning permissions to ensure sufficient quality and scale of provision for residents, including consideration of size guidelines. Also:
- HMOs should feature appropriately located and sized basic amenities e.g. adequate cooking facilities and sufficient space for seating to use whilst dining. Dining space should preferably be provided on the same floor as the kitchen.
 - All rooms shall have a satisfactory floor to ceiling height, existing attic rooms must be shown to be sufficient. Throughout the HMO, any floor area where the ceiling height is less than 1.5 metres shall be disregarded and not counted as useable space.
 - Adequate outlook from bedrooms is necessary to ensure good quality living space for occupants.
- 4.35 Accommodation should be safe in all respects. Proposals in Flood Zones 2 and 3 will be subject to national and local policy on flood risk management. This may prevent bedrooms on the ground floor of properties and/ or mitigation measures to adequately reduce the risk to future occupants from flooding.
- 4.36 Overall residential amenity space principles elsewhere in the Dartford Plan may also apply. Policy M9 requires provision that maximises functionality for users, with applicants required to show how developments have been designed to address essential health and well-being needs including fresh air, sunlight and storage provision.
- 4.37 HMO rooms are occupied as the sole space for the occupants to live their lives and therefore activities that may be carried out in a ground floor living room in a family home are carried out in a first or second floor room. Everyday activity is materially more audible through party walls particularly in older housing stock and where chimneys have been removed. Placing HMO rooms directly adjacent to neighbouring bedrooms typically results in disturbances.

- 4.38 It is common for unrelated adults to have unsynchronised routines which can result in unacceptable impacts on internal and external amenity at HMOs. Where a conflicted layout remains, an explanation for why alternatives are not feasible must be provided and may weigh against the scheme.
- 4.39 Consideration is needed of the relationship between internal rooms, stacking and appropriate acoustic levels for occupants and neighbours. If such rooms were to be in close proximity resulting in unacceptable impacts, refusal is likely unless there is evidence that noise and vibration mitigation can prevent such harm to neighbouring residents (Dartford Plan policy M2). Where the HMO would be adjacent to a single family dwelling, such evidence should be submitted upon the initial submission of any planning application and testing prior to occupation may be required.
- 4.40 A package of design and layout interventions, and equipment with mitigating features, are likely to be sought. Where necessary, a condition requiring sound reduction measures may be included in a planning permission for new HMO developments, where the requirements are beyond the noise insulation required under building regulations.
- 4.41 Considering that most HMOs are converted from existing dwellings, older materials should be considered for refurbishment or replacement where appropriate to reduce noise and disturbance.

H5: HMO OUTSIDE SPACE & FACILITIES

HMO development should demonstrate provision of sufficient quantity and quality of private amenity space, and appropriate outdoor waste storage and clothes drying arrangements, meeting the following criteria:

1. Existing front and rear garden land should be retained wherever possible in use as a garden, including where ground floor extensions are proposed, and where conversion to an HMO is proposed it is expected that total private amenity space should always be provided at a level no less than that of a Use Class C3 house. Where there is insufficient existing space to provide an outdoor amenity area of this scale permission is unlikely to be granted unless the property is located in the Urban Area and within 400m walking distance of a public open space suitably laid out and sized to encourage informal recreation.
2. Outside amenity space should be demonstrated to be of good quality and sufficient to the scale needs of occupants, and:
 - a) Should be appropriately sited, shaped e.g. rectangular, and managed, to ensure it is usable, and receives direct sunlight for at least an hour a day from spring through autumn.
 - b) Should be of a size and form to ensure that use of this space does not adversely impact neighbours
 - c) Gardens must be readily accessible from communal internal spaces by all residents (not reliant on access through a private room) and provide soft landscaping and a sitting out area with seating for all HMO occupants.
3. HMO developments should always include outdoor space in an appropriate location sufficient for all equipment required, for clothes drying, refuse, waste and recycling, and bicycle storage:
 - a) External storage for waste and recycling must be adequate in size and designed so as to ensure it does not detract from the general amenity and character of the area and not have a negative impact on the amenity of HMO occupants or their neighbours, and be easily accessible by all residents. Storage should not be prominent in the street scene, and where necessary should be screened using landscaping, fencing, hedges, or suitable purpose-built storage units, and should not block pedestrian or vehicular visibility splays, or create dark recessed areas which could encourage misuse, vandalism or pest control problems.
 - b) Outside drying space should be capable of providing a rotary /umbrella washing line or a long line, and not overlap with sitting out areas, waste storage or parking areas.
- 4.42 Appropriate gardens and outside space/ facilities are essential to both the well-being of HMO residents and their neighbours, and to the local environment. The Dartford Plan is clear that all developments should not erode the provision of gardens (set out in M10). Gardens are an integral feature of the homes it is important to retain in the borough. Policy M10, part 2 states 'Development which results in an unacceptable loss of residential garden land will be refused'. Once garden land is lost to buildings, or even outdoor hard surfacing, it is very hard to reinstate, even if use as an HMO (for instance) ceases.
- 4.43 Extensions of properties may have to be designed carefully and limited in scale accordingly; or alternatively it may be that the site is not capable of hosting an extension.

- 4.44 Requirements of H5 expect that front and rear garden land of sufficient size, usability and appeal is retained wherever possible in conversions (a wholly new-build HMO building may make provision akin to new build self-contained apartments). Development should refer to the practical guidelines Dartford Plan policy M9. Specifically, the retained private amenity space must be sufficient and of high quality to meet the health, recreation and functional needs of occupants and to contribute to good design, wellbeing and wider environmental objectives.
- 4.45 Given the more intensive occupancy expected to arise, the provision of private amenity space for HMOs is expected to be at least equivalent to (or more likely exceeding that of) a C3 dwelling, using size guidelines in supporting paragraphs 5.90 and 5.93 of the Dartford Plan as context. Where this is not achievable, which is ordinarily only the case in urban settings where there is an existing lack of sufficient outdoor space on site, development is only potentially acceptable where within 400m walking distance to a usable public open space which can meet the needs of the occupants (anticipated to be a facility shown as Borough Open Space or Protected Local Green Space on the policies map). This will not be appropriate where an existing residential garden is built over to provide an extension or parking.
- 4.46 Evidence should be supplied relating to the appropriateness of residential amenity space demonstrating that it is genuinely usable and sufficient to make good provision for the needs of residents. Requirements set out in Policy M9 expect development to enhance the health and wellbeing of the Borough's residents. Paragraph 5.90 of that policy includes reference to a guideline private amenity space quantity of 60sqm or more. The form of space provided, and features such as soft landscaping and seating should ensure amenity space functions well for regular use and cater for the number of occupants (clause 2 above).
- 4.47 Due to the more intensive use patterns typical of HMOs, proposals should include details on mitigation so that intensified use of the property and therefore potentially greater outdoor activity does not adversely affect neighbouring amenity (for example through disturbance, overlooking or late evening congregation); thus, aligning with Policies M1 and M2 of the Dartford Plan. This may include measures such as acoustic fencing, where necessary and appropriately designed, alongside other landscaping/boundary treatments. The Council will resist poor provision that would create material harm to adjoining occupants.
- 4.48 Under clause 3 above, plans must integrate sufficient space for clothes drying, waste disposal arrangements and recycling storage without undermining residential amenity or street quality. Bin stores must be of adequate capacity, convenient for residents and collection crews, and screened to protect residential amenity; meeting Policy M3 (5) objectives. Provision should be sufficient to accommodate at least 180 litres for refuse and 240 litres for recycling for up to 3 residents, with additional capacity required for larger HMOs in proportion to the number of residents. Provision can be made through separate bins for each household or communally through larger, shared bins.
- 4.49 Appropriate provision should also be made for cycle parking, having regard to the quantity, design, siting and accessibility requirements set out in Policy H6. Cycle parking is expected to be secure, convenient to use and not conflict with other outdoor functions or harm the street scene. Drying areas should be shown separately from sitting out areas and parking so each function without conflict, aligning with Dartford Plan Policy M9.

H6: HMO VEHICLE & CYCLE PARKING PROVISION

HMO development should demonstrate provision of sufficient quantity and quality of motor vehicle and bicycle parking which meets the needs of the users.

The required parking provision shall take proper account of the increase in occupants resulting from the proposal. This will consider the notional parking requirements for the existing lawful use of the property at the time of the application, and the existing parking provision on site.

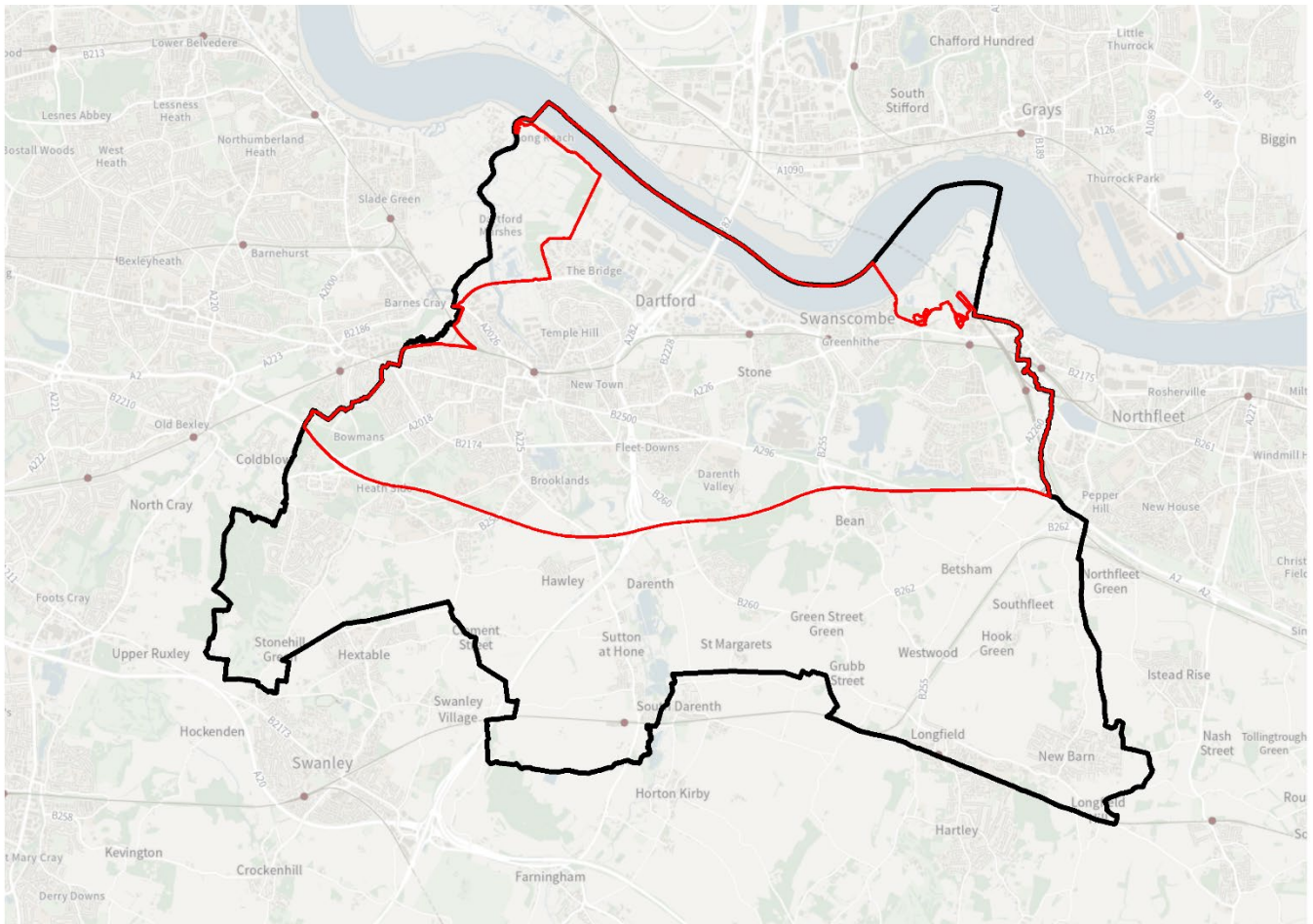
- 1) Vehicle parking is expected to be provided with regard to:
 - a) The parking requirement for the existing lawful use.
 - b) The existing and potential parking provision on site, taking into account the space requirements for waste and cycle storage.
 - c) The loss of on-site parking spaces due to the provision of on-site spaces.
 - d) The degree of parking stress on local streets and whether parking management arrangements are in place sufficient to manage the projected additional on-street parking that could be generated by the proposal.
 - e) Where applicable, the quality of non-vehicular transport options for particular locations in the Urban Area. If there is demonstrated to be convenient and safe walking/ cycling routes to railway stations or well served bus stops, proximity to retail and employment centres identified in the Dartford Plan, and access to other well used services and local infrastructure (for example GPs) this may change the necessary level of provision.
 - f) Impact on the street scene and retention/ provision of residential garden land from parking proposed at the property. This will take account of the quality and extent of landscaping/ garden that will be secured or retained. Where it is not possible to avoid material adverse street scene and garden loss impacts from necessary parking provision, particularly on designated and non-designated heritage assets, HMO development would accordingly be resisted.
 - g) Parking provided on site will be required to be made available to the occupants of the HMO only and for no other users unrelated to the HMO occupation.
 - 2) HMO developments should feature adequate dedicated provision for cycle storage, at a level of one cycle space or more per adult occupant. Cycle storage areas will need to be secure, covered and sensitively designed and sited to reduce the impact on neighbouring residents and the streetscene, but with a clear, convenient and level route available to the public highway and direct easy, level access from the HMO entry/ exit point to the cycle storage for all occupants. Proposals with inadequate quantity or quality of cycle parking are likely to be resisted.
- 4.50 Requirements in H6 help guide consideration of HMO proposals, and to ensure parking provision suitably reflects the location, proposed residential intensity, the level of vehicle use and parking space impacts; as well as demonstrating adequate provision for cycle storage.
- 4.51 Development should align with Policy M16 of the Dartford Plan (Active Travel, Access and Parking) and consider the necessary vehicle and bicycle parking provision. Vehicle parking requirements are based on rooms in an HMO rather than occupants (as for example rooms occupied by a couple are likely to have only 1 car).

- 4.52 The **quantitative guidelines for vehicle parking to be applied as part of clause 1** above are:
- South of the A2: 1 parking space for every occupied room within an HMO
 - North of the A2: 1 parking space for every 2 occupied rooms within an HMO; apart from where at Central Dartford (Figure 1 above) considered on a case-by-case basis.
- 4.53 The number of vehicle parking spaces should be considered as a minimum, to be applied as a starting point. The notional parking requirement of the existing lawful use of the property will be considered (using the Borough's existing parking standards) together with the parking spaces provided. The following worked examples are provided to illustrate:
- Proposal at a 3-bedroom house north of the A2 (urban area outside of Central Dartford) would currently require 1.5 parking spaces for the single dwellinghouse but based on the criteria above a proposed conversion to a 5-bedroom HMO would require 2.5 parking spaces. Therefore, a net total of 1 additional space will therefore need to be provided within the site to meet the HMO use where there are 1.5 spaces provided for the existing use.
 - Proposal at a 4-bedroom house south of the A2: it would currently require 2 parking spaces but based on the criteria above a proposed conversion to a 6 room HMO would require 6 parking spaces. Therefore, a net total of 4 additional spaces will need to be provided within the site to meet the HMO use where there is 2 spaces provided for the existing use.
- 4.54 Regard can be had that HMOs typically accommodate several adults, but they may have differing travel to work needs or car ownership levels to many other Borough residents. This is especially in locations with safe and convenient walking and cycle routes, or where well served by public transport. e.g. much of Central Dartford.
- 4.55 Policy M15 (Travel Management) requires developments to avoid localised residual impacts on the highway network. Where streets are already near full capacity, there is a risk that intensification can displace parking and create highway/ amenity impacts. An on-street audit/ survey could be supplied along with a statement detailing parking stress on local streets and the accessibility of the site to help assess matters detailed in clause 1. Vehicle parking spaces should be independently accessible as tandem parking arrangements are likely to be ineffective for HMO occupants.
- 4.56 As set out in Policy M16, Planning applications for potentially inappropriate loss of gardens for parking will be closely examined, given highway and environmental impact. This is especially where the setting of the site includes designated and non-designated heritage assets (Policies M5 and M6 of the Dartford Plan). Where parking necessary for the HMO use would cause material harm to safety, the street scene or unacceptable garden loss, applications may need to be refused under clause 1.
- 4.57 Under clause 2 above, cycle stores will need to be sensitively designed and sited to reduce the impact on neighbouring residents or the street scene. Cycle storage should be shown on a site plan as part of the planning application. The submitted site plan must also show the location, size of the cycle storage area and elevations must be provided of the store design. Occupants should not be expected to have to bring the bike through the HMO property from a rear cycle store. External access must be provided. Spacious access should be provided for all occupants of the HMO and there should be safe and convenient access to the public highway. The design of provision is addressed elsewhere in this SPD.

APPENDIX

PLAN OF BOUNDARIES FOR THE IMMEDIATE AND NON-IMMEDIATE ARTICLE 4 DIRECTION

Confirmed boundary plan of the area north of the A2 where the immediate Article 4 Direction for Class C4 Houses in Multiple Occupation applies – Date of commencement 9th December 2025



Confirmed boundary plan of the area south of the A2 where the Non- immediate Article 4 Direction for Class C4 Houses in Multiple Occupation applies – Date of commencement 10th December 2026

