

Design & Access Statement

Revision B — September 2026

Site	Land at Empress Road (former garage court adjacent to No. 33), Gravesend, Kent
Proposal	Demolition of disused garages and erection of a building of two storeys with accommodation within the roof, comprising 7 self-contained flats, with alterations to the existing vehicular access, parking, cycle and refuse storage, amenity space and landscaping
Local Planning Authority	Gravesend Borough Council
Pre-application reference	PRE20240129 (advice dated 1 August 2024)
Document reference	EMP-DAS-002 Rev B
Supersedes	Design & Access Statement, October 2025
Appendix A	Roof Form Precedent Survey EMP-RPS-001 Rev B
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Date	September 2026

1. Introduction and status

This Design and Access Statement supports a full planning application for the redevelopment of a disused garage court at Empress Road, Gravesend. It supersedes and replaces in full the Design and Access Statement issued in October 2025.

The statement has been rewritten for two reasons. The scheme has been revised in response to the Council's pre-application advice and now comprises seven flats rather than ten, at two storeys with accommodation contained within the roof rather than three full storeys. And national planning policy has changed: the National Planning Policy Framework published on 17 August 2026 replaced the December 2024 Framework and took effect on publication, replacing 243 numbered paragraphs with 131 lettered policies and removing the paragraph 11 route in favour of policies S3 to S5. Any application determined after that date falls to be assessed against the current Framework. The earlier statement was drafted against superseded policy and could not be corrected by renumbering.

The application is accompanied by a Traffic and Access Statement (EMP-TAS-002 Rev B), a Parking Management Plan (EMP-PMP-002 Rev B), a Waste Management Plan (EMP-WMP-002 Rev B), a Biodiversity Gain Exemption Statement (EMP-BGE-001 Rev A) and the Roof Form Precedent Survey at Appendix A (EMP-RPS-001 Rev B). All are consistent with the Revision B drawings and with one another.

1.2 Drawings

Drawing	Title
198/P01	Site Location Plan
198/P02	Existing Site Plan
198/P03 Rev B	Proposed Site Plan
198/P04 Rev B	Proposed Floor Plans
198/P05 Rev B	Proposed Elevations
198/P06 Rev B	Proposed Sections
198/PBLOCK Rev B	Proposed Block Plan, parking and access

Where a figure in this statement is also scheduled on a drawing, the drawing governs.

2. The site and its context

2.1 The site

The site is a former garage court of approximately 0.06 hectares lying behind the Empress Road frontage and adjoining No. 33. National Grid Reference 566115 173777. It is served by an existing vehicular access from Empress Road and lies immediately adjacent to Scotts Yard.

The garages are disused, structurally redundant and in a derelict condition. The site surface is almost entirely sealed: approximately 500 square metres of asphalt and concrete hardstanding with around 50 square metres of sparse ruderal vegetation colonising the margins. There are no trees on the site, no watercourse, and no habitat of any distinctiveness above “low” on the statutory metric. It is previously developed land in the terms of the Framework’s glossary.

2.2 Designations and constraints

The site carries no heritage or environmental designation. Specifically:

- It is not listed and does not lie within the curtilage of a listed building;
- It does not lie within a conservation area;
- It does not lie within the setting of any designated heritage asset;
- It contains no protected tree and is not subject to a Tree Preservation Order;
- It lies within Flood Zone 1;
- It contains no priority habitat;
- It lies within the settlement boundary of Gravesend.

The statutory duty at section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is not engaged, and neither are the designated heritage asset provisions of the current Framework.

2.3 Surrounding character

The site sits within the Milton area of Gravesend, in a dense Victorian and Edwardian residential grain of two-storey terraces laid out on a tight grid. Empress Road, Range Road, Lower Range Road and Elliott Street are all of this pattern. The A226 corridor — Milton Road, East Milton Road and Rochester Road — forms the principal frontage and carries the local shopping parade, the Grade II* listed Church of St Peter and St Paul, and a series of larger buildings of three levels.

That last point is the important one for this application, and it is evidenced in full at Appendix A. Three levels of accommodation is the established scale on this frontage, not an intensification of it. Where a third level occurs it is invariably subordinated, either by containment within the roof or by setting the storey back behind the elevation below. Roof coverings are slate or dark plain tile without exception; walling is buff London stock brick, frequently with painted render dressings or red brick banding.

2.4 Accessibility

Distances below are measured from the site frontage along the pedestrian route and rounded to the nearest 50 metres. Walking times assume 1.3 metres per second.

Destination	Walked distance	Walking time
Bus stops, A226 corridor (both directions)	80 m	1 minute
East Milton Road local centre — convenience store, post office, public house, hot food	250 m	3 minutes
St John's Catholic Primary School, Rochester Road	300 m	4 minutes
Waterton Park Open Space — public open space and children's play	350 m	5 minutes
Gravesend Grammar School	350 m	5 minutes
Pharmacy, Rochester Road	950 m	12 minutes
Gravesend town centre	1.6 km	20 minutes
Gravesend railway station — Southeastern and high speed services to London St Pancras	1.8 km	22 minutes

The site is well served for daily needs. A convenience store, post office, primary school, public open space and bus stops in both directions are all within a five-minute walk. The railway station is a twenty-minute walk and is more realistically reached by the frequent bus services on the A226 corridor, which stop within eighty metres of the site.

3. Planning history and pre-application advice

Pre-application advice was sought under reference PRE20240129 and issued on 1 August 2024 in respect of a ten-unit scheme at three storeys. The advice raised three matters of substance: the number of units relative to the site area, compliance with the Nationally Described Space Standards, and the height and massing of the building relative to the two-storey grain of Empress Road.

The Revision B scheme responds to each directly.

Matter raised	Response in the Revision B scheme
Number of units relative to site area	Reduced from ten units to seven. The scheme now falls below the ten-dwelling major development threshold, with the consequences set out at Section 3.1.
Compliance with space standards	Every unit meets or exceeds the relevant Nationally Described Space Standard, as scheduled on drawing 198/P04 Rev B. Floor plates have been set generously above the minima rather than at them.
Height and massing	The third level of accommodation is now contained within the roof rather than expressed as a third storey. The eaves are held at the height of the neighbouring two-storey grain and the roof is hipped down towards the shared boundary.

3.1 Development category

At seven dwellings the proposal is minor development. Three consequences follow, and each is relevant to the Council's handling of the application: the statutory determination period is eight weeks rather than thirteen; the information requirements are correspondingly lighter; and the scheme falls below the threshold at which an affordable housing contribution is sought.

4. The proposal

4.1 Description of development

Demolition of disused garages and erection of a building of two storeys with accommodation within the roof, comprising 7 self-contained flats, with alterations to the existing vehicular access, parking, cycle and refuse storage, amenity space and landscaping.

4.2 Schedule of accommodation

Level	Units	Type
Ground floor	3	1 bedroom, 2 person
First floor	2	2 bedroom, 4 person
Within the roof	2	3 bedroom, 5 person
Total	7	Total gross internal area 514.6 m ²

Individual unit areas are scheduled on drawing 198/PO4 Rev B. Every unit meets or exceeds the relevant Nationally Described Space Standard. Two of the seven are genuine family-sized three-bedroom homes, which is a mix the borough is short of and which a scheme of this scale is rarely able to offer.

4.3 Associated provision

Element	Provision
Car parking	5 spaces at 0.71 per dwelling, including one accessible bay, dimensioned on 198/PBLOCK Rev B. Passive electric vehicle charging provision to all bays and active provision to two.
Cycle parking	Secure, covered, lit and lockable store at ground level with step-free access from the site entrance. Not less than one long-stay space per dwelling on Sheffield stands, two short-stay visitor stands, and one space sized for a cargo or adapted cycle.
Refuse and recycling	Purpose-built enclosed store at the western end of the site, sized and located as set out in the Waste Management Plan, with a managed presentation regime to the site entrance on collection day.
Amenity space	Communal amenity space at ground level with soft landscaping to the boundaries; private amenity by way of the ground floor terraces.
Access	Alteration and upgrading of the existing vehicular access from Empress Road, which has served the garage court throughout its life.
Energy	Roof-mounted photovoltaic array on the concealed upper deck of the truncated roof, invisible from the public realm.

4.4 Density

Seven dwellings on 0.06 hectares equates to approximately 117 dwellings per hectare. That figure is high in the abstract and entirely appropriate here. The site is a sealed, derelict, backland garage court within a settlement, in an area of dense terraced housing, within a five-minute walk of a local centre and eighty metres of a bus corridor. Policy L2 of the Framework attaches substantial weight to precisely this form of intensification. Density measured against a small backland site area is in any event a poor proxy for perceived scale; what matters is the height, massing and relationship to neighbours, and those are addressed at Section 5.

5. Design

5.1 Use

Residential, Class C3. The existing garage court is redundant: the garages are too small for modern vehicles, are unlettable in their present condition, and generate no activity beyond fly-tipping and antisocial behaviour. The site contributes nothing to the character of the area and detracts from the amenity of the properties that back onto it. Residential use restores natural surveillance to a backland space that currently has none.

5.2 Amount and layout

The building occupies broadly the footprint of the existing garages, at approximately 500 square metres, with parking and circulation to the western end and the refuse store beyond. The layout is driven by three constraints: the retention and improvement of the existing access point, the need to keep habitable room windows away from the rear boundaries of the surrounding terraces, and the requirement to hold the mass of the building down at its most exposed edge.

Habitable room windows are arranged to face along the site rather than across it. Where an outlook towards a boundary was unavoidable, the opening has been placed high or obscured. No new window creates an overlooking relationship with a neighbouring garden at a distance below the Council's adopted separation standard.

5.3 Scale and the roof — the central design decision

The building reads as two storeys with a roof. It does not read as three storeys. That is the whole of the design strategy and it is worth setting out why it was adopted, on six grounds.

(a) Hipping suppresses height where it matters

The roof is hipped down towards the shared boundary rather than gabled. A gable presents its full height at the boundary; a hip falls away from it. The apparent height of the building from the rear gardens of the surrounding terraces is materially lower than the ridge height would suggest. This is not an unusual move locally: it is the standard response at exposed edges throughout Milton, evidenced at Appendix A.

(b) Accommodation in the roof avoids a third storey

The two three-bedroom units sit within the roof. Had they been placed in a third storey, the eaves line would have risen by a full floor and the building would have stood clear of the two-storey grain on every elevation. As drawn, the eaves are held at the height of the neighbouring terraces. The additional accommodation is bought at the cost of roof volume rather than wall height, which is the cheaper cost in townscape terms.

(c) Truncation conceals the photovoltaic array

The roof is truncated to a concealed flat deck. That deck carries the photovoltaic array. A conventional pitched roof would have required the panels to be mounted on a visible slope, which on a building of this prominence would have been the least attractive element of the scheme. The truncation is not a stylistic affectation; it does a job.

(d) A 45 degree pitch matches the local roofscape

The pitch is 45 degrees. A steeper slope — the seventy degree lower slope of a true Parisian mansard — would be a foreign form in this street and would read as pastiche imported from elsewhere. A shallower slope of thirty degrees or less would read as a contemporary developer box with a token pitch. Matching the local pitch is the single most legible way in which a new roof either belongs in a street or does not, and it costs nothing to get right. The survey at Appendix A establishes that 45 degrees sits within, and at the restrained end of, the range already built in this catchment.

(e) The form is expressly supported by national policy

Policy L2 of the current Framework gives substantial weight to the better use of underused land and to additional homes within settlements, and — unusually for national policy — names the physical devices it has in mind. Airspace, mansard roofs and roofline gaps are identified in terms. National policy now positively contemplates habitable roof storeys as a means of intensification within settlements. That is a stronger position than any previous Framework offered and it applies directly to this roof.

(f) The Council has accepted the same device in this town

The argument is not theoretical. Gravesham Borough Council has recently granted permission for the same strategy in more sensitive locations than this one. Those decisions are set out at Section 5.4.

5.4 Decision precedent — accommodation within the roof, Gravesham Borough

The following are the Council's own decisions. They are cited because a local planning authority is entitled to expect consistency from itself, and because both involve designated heritage constraints that this site does not have.

Reference	Site	Decision	Relevance
20240019	11–13 Queen Street, Gravesend DA12 2EQ	Approved. Mansard roof extension creating four additional residential units at upper floors.	The site lies within a conservation area. The Conservation Officer raised no objection. The committee record notes that the mansard did not result in any significant increase in height and that the building would retain the low profile identified as a key feature in the conservation area appraisal. The principle that a mansard or truncated roof can add residential floorspace without adding perceived height has been accepted by this authority, in a conservation area.
20220432	Former Police Station, 133 Windmill Street, Gravesend DA12 1DB	Approved 28 September 2022, subject to conditions and a section 106 agreement. 75 retirement apartments in a five-storey building including roof space.	The site lies within the Upper Windmill Street Conservation Area and adjoins listed buildings. The Council accepted a building whose top level was expressly accommodated within the roof space. If accommodation within the roof was acceptable there, at that scale and with those constraints, it is acceptable here at seven units on unconstrained previously developed land.

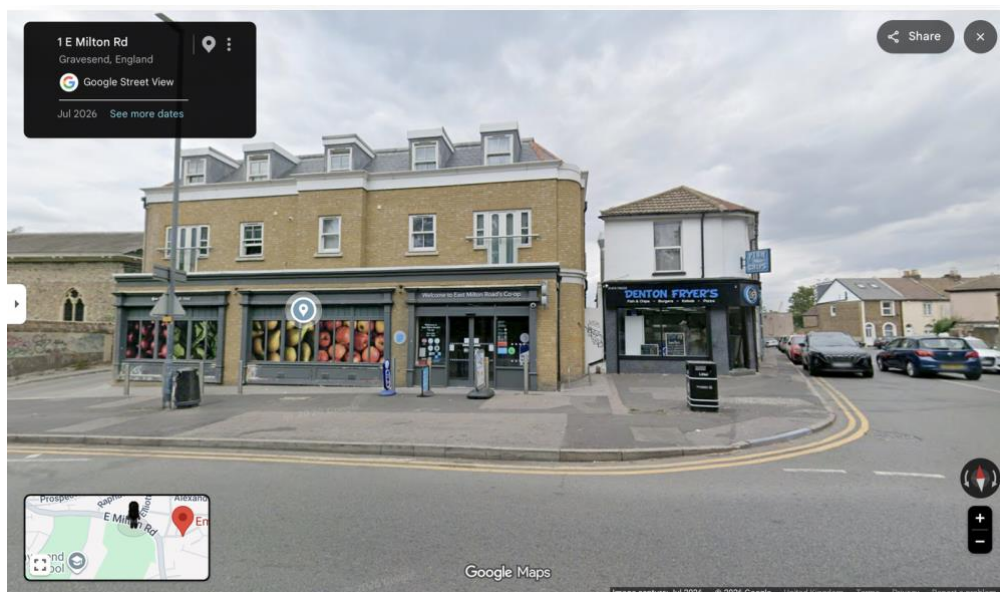
5.5 Roof form in the surrounding streets — survey evidence

The argument set out at Section 5.3 is supported by a survey of roof form in the streets surrounding the site, carried out in September 2026 and reported in full at Appendix A (EMP-RPS-001 Rev B). Six examples were recorded, all of them within a three-minute walk of the site frontage. The survey is not offered as a stylistic justification. It is offered because the question the Council has to answer — whether a roof of this form is in keeping with the character and appearance of the area — is a question of fact about the area, and the area answers it.

The survey establishes the following. Three levels of accommodation is the established scale on this frontage rather than an intensification of it; five of the six examples carry three levels. Where a third level occurs it is invariably subordinated, in three cases by containment within the roof and in two by setting the storey back behind the elevation below. The mansard is present in the immediate context as a modern device on a modern flatted building, at 1–2 East Milton Road, two hundred metres from the site and of the same building type as the proposal. Dormers in the local grain are modest, vertically proportioned, regularly spaced and held back from the eaves. Hipping the roof down at an exposed corner or boundary is the normal local response. Roof coverings are slate or dark plain tile without exception, over buff London stock brick walling with painted render dressings or red brick banding.

Two points deserve particular emphasis. First, the proposed pitch of 45 degrees sits at the shallower, more restrained end of the range already built in this catchment: the mansard lower slope at 1–2 East Milton Road is materially steeper, and the traditional terrace roofs on the same street sit at approximately 40 to 45 degrees. The proposal is among the quieter roofs in its street, not the most assertive. Second, the mansard-roofed building at 1–2 East Milton Road adjoins the churchyard of the Church of St Peter and St Paul, listed Grade II*, and stands alongside the separately listed war memorial within it. Permission for that roof was granted in a setting engaging the duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This site engages no such duty.

The proposal therefore asks the Council to accept nothing it has not already accepted within a three-minute walk, on sites more sensitive than this one.



1–2 East Milton Road — the closest comparable. A modern flatted building carrying its uppermost level of residential accommodation wholly within a slate mansard over a commercial ground floor, 250 metres from the application site and immediately adjoining the churchyard of the Grade II* listed church. Full survey at Appendix A. Imagery © 2026 Google.

5.6 Appearance and materials

The palette is taken from the survey rather than proposed and then defended.

Element	Specification
Walling	Buff London stock brick, laid in stretcher bond, selected to match the prevailing tone of the Milton terraces. Red brick banding and cill course as a secondary accent, following local practice.
Roof	Natural or high-quality artificial slate to the pitched slopes, hipped at 45 degrees, truncated to a concealed flat deck.
Dormers	Gabled dormers, vertically proportioned, at regular centres and held back from the eaves, in lead or dark standing-seam metal cheeks with slate or metal roofs.
Windows	Powder-coated aluminium or high-performance timber, in a dark or off-white finish to be agreed, with vertical proportions and recessed reveals.
Rainwater goods	Cast metal or aluminium in a dark finish; no plastic to visible elevations.
Boundaries	Brick walls to match the building where the boundary is prominent; close-boarded timber with trellis where it abuts private gardens.
Hard landscaping	Permeable block paving to the parking court; resin-bound or bonded gravel to pedestrian routes.

Final specification of brick, slate and window finish can properly be secured by condition on the basis of samples.

5.7 Landscaping and biodiversity

The site is presently 90 per cent sealed. The scheme replaces asphalt with a mixture of building footprint, permeable paving and soft landscaping, and introduces planting where none exists. Boundary planting of native hedging and climbers is proposed together with two small ornamental trees within the communal amenity area. Bird and bat boxes are proposed on the new building.

The site area of 0.06 hectares falls below the 0.2 hectare threshold introduced by amendment to the Biodiversity Gain Regulations with effect from 6 August 2026, and the site contains no priority habitat. The statutory biodiversity gain condition therefore does not apply. This is addressed in full in the Biodiversity Gain Exemption Statement, EMP-BGE-001 Rev A. The landscaping and ecological enhancements described above are offered voluntarily and can be secured by condition.

6. Access

6.1 Vehicular access

The site has been served by a vehicular access from Empress Road throughout the operational life of the garage court. That access is retained. The proposal alters and upgrades it: the crossing is widened to current standards, the dropped kerb and tactile treatment are renewed, visibility splays are formed to the standard appropriate to the recorded speeds on Empress Road, and the surface is reconstructed in permeable paving with drainage falling within the site.

This is an alteration to an existing access rather than the creation of a new one. The principle of a vehicular crossing at this point is long established and no additional length of kerb is lost to a crossing that did not previously exist. The works improve pedestrian and driver visibility over the existing arrangement. Full detail is set out in the Traffic and Access Statement.

6.2 Pedestrian access

Pedestrian access is from Empress Road, level and separated from the vehicle route where the width allows. All principal entrances are step-free. External routes are laid to falls not exceeding 1 in 20 and lit to a specification that supports both safety and dark-sky considerations.

6.3 Inclusive access

All seven units are accessible and adaptable in accordance with Part M4(2) of the Building Regulations. One accessible parking bay is provided, sized to the standard dimensions and located on the shortest route to the entrance. Communal doors are power-assisted where required and thresholds are level throughout. Corridors and door widths follow the Approved Document M dimensions.

6.4 Emergency and servicing access

The layout provides for fire service access in accordance with Approved Document B, with a hardstanding capable of taking a pumping appliance within the required distance of the building entrances. Servicing and refuse collection arrangements are set out in the Waste Management Plan; refuse containers are presented at the site entrance so that no collection vehicle is required to enter the site and no crew is required to drag containers over an excessive distance.

7. Internal quality and space standards

7.1 Floor areas

Every unit meets or exceeds the relevant Nationally Described Space Standard, with areas scheduled on drawing 198/PO4 Rev B. Floor plates have deliberately been set above the minima rather than at them. Two consequences follow. The units are more attractive to occupy and to let. And the units at roof level carry a margin that absorbs the geometry of the roof without falling below standard.

7.2 Head height at roof level

The Nationally Described Space Standards require that in a dwelling with a partly sloping ceiling, not less than 75 per cent of the gross internal area has a clear head height of at least 2.3 metres. The two roof-level units satisfy this comfortably, by design rather than by narrow arithmetic, for two reasons working together.

First, the floor plates at roof level are oversized relative to the standard for a three-bedroom five-person dwelling. The additional area is deliberate: it provides the margin within which the sloping perimeter of the roof can be absorbed without compressing the usable area below the threshold.

Second, the roof is a truncated mansard rather than a simple pitch. The lower slope rises steeply from the eaves and the roof is then truncated to a flat deck, so the full-height envelope extends much closer to the external wall than a conventional 45 degree pitch would allow, and the ceiling above the central zone of each unit is flat rather than apexed. The volume this produces is the reason the mansard was selected over a plain pitched roof carrying dormers. The relationship is shown on the sections at drawing 198/PO6 Rev B and the compliant area is indicated on the roof-level plan at 198/PO4 Rev B.

7.3 Daylight, outlook and privacy

Each habitable room has a window to an external wall or to a dormer with clear outlook. Dormers to the roof-level units are proportioned to provide both light and a seated-level view rather than a sky-only outlook. No habitable room is single-aspect north-facing without a compensating second aspect. Separation distances to the rear elevations of the surrounding terraces meet or exceed the Council's adopted standards.

7.4 Amenity of neighbouring occupiers

The building is positioned and massed to protect the amenity of the properties backing onto the site. The hipped roof falls away from the shared boundary; the eaves are held at the height of the neighbouring two-storey grain; windows are arranged along the site rather than across it. The existing condition — a derelict, unsupervised garage court — is itself a source of nuisance to those neighbours, and its removal is a benefit to them in its own right.

8. Sustainability, energy and drainage

8.1 Energy

The scheme is designed to a fabric-first standard, with the building envelope specified to exceed the elemental values required by Part L. Heating and hot water are provided by individual air source heat pumps. A photovoltaic array is mounted on the concealed upper deck of the truncated roof, where it is invisible from any public vantage point — an advantage of the roof form that a conventional pitch could not offer. No fossil fuel combustion is proposed on site.

8.2 Drainage

The site is within Flood Zone 1. The existing surface is almost entirely impermeable, so the scheme presents an opportunity for betterment rather than merely for mitigation. Surface water is managed through permeable paving to the parking court, soft landscaping to the boundaries and attenuation beneath the hardstanding, with discharge rates restricted below the existing unrestricted run-off. Foul drainage connects to the existing public sewer.

8.3 Waste and recycling

Storage capacity, container specification, presentation arrangements and collection are addressed in full in the Waste Management Plan EMP-WMP-002 Rev B.

8.4 Construction

An asbestos survey will be carried out before demolition and any asbestos-containing materials removed under licence. Construction hours, wheel washing, dust suppression and the routing of construction traffic are addressed in the Traffic and Access Statement and can be secured through a Construction Management Plan condition.

9. Planning policy assessment

9.1 The applicable framework

The National Planning Policy Framework published on 17 August 2026 applies. Annex A directs that a development plan policy which is materially inconsistent with a national decision-making policy should be given very limited weight. The site lies within a settlement, so policy S4 governs the decision: permission should be granted unless the benefits are substantially outweighed by the adverse effects.

9.2 Assessment

Policy	Assessment
S3 – S5 Decision-making and the presumption	The site is previously developed land within a settlement boundary. Policy S4 applies. The benefits — seven homes including two family-sized units, the removal of a derelict and antisocial backland site, and the efficient use of sealed land — are substantial. The adverse effects are limited to matters of design and highways, both of which are addressed and neither of which approaches the threshold at which the benefits would be substantially outweighed.
L2 Intensification and better use of land	Directly engaged and directly supportive. L2 attaches substantial weight to the better use of underused land and to additional homes within settlements, and expressly names mansard roofs and airspace among the devices contemplated. The proposal is a textbook application of the policy: a derelict, sealed backland site brought forward for seven homes with the uppermost level contained within the roof.
L3 Density	The proposal is at approximately 117 dwellings per hectare on a small backland site. The site is not within the walking catchment of the railway station at which L3's higher density expectations bite, but the density is nevertheless justified by its location within a dense terraced grain, eighty metres from a bus corridor and within five minutes of a local centre. Perceived scale, not arithmetic density, is the relevant test, and perceived scale is two storeys with a roof.
HO7 Housing mix and standards	Every unit meets or exceeds the Nationally Described Space Standards. All units are M4(2) accessible and adaptable. The mix includes two three-bedroom family units, which is a size the borough is short of and which this scale of scheme rarely delivers.
TR1 – TR6 Transport	Addressed in full in the Traffic and Access Statement. The net increase in vehicle movements over the existing lawful garage court use is negligible. Parking is provided at 0.71 spaces per dwelling with a management regime. Cycle provision exceeds one space per dwelling. The relevant test — unacceptable impact on highway safety or severe residual cumulative impact — is not approached.
N2 Biodiversity	The site contains no priority habitat and is exempt from the statutory biodiversity gain condition by virtue of its 0.06 hectare area. The scheme nevertheless delivers a material ecological improvement over a wholly sealed baseline, through soft landscaping, native boundary planting and bird and bat boxes. See EMP-BGE-001 Rev A.
DM2 Design	The design responds to a documented reading of local character rather than to assertion. Scale, roof form, pitch, dormer proportion and material palette are each derived from the survey at Appendix A. The scheme preserves the amenity of neighbouring occupiers and improves the appearance and security of a derelict site.

Policy	Assessment
HE5 – HE9 Historic environment	Not engaged. The site is not listed, is not within the curtilage of a listed building, is not within a conservation area, and does not lie within the setting of any designated heritage asset.

10. Conclusion

The proposal delivers seven high-quality homes, including two family-sized three-bedroom units, on a derelict garage court within a settlement. Every unit meets or exceeds the national space standards and all are accessible and adaptable. The site is previously developed, sealed, undesignated and of negligible ecological value, and its present condition is a liability to the neighbours whose gardens back onto it.

The design decision that carries the scheme is the roof. Containing the third level of accommodation within a hipped, truncated roof rather than expressing it as a third storey holds the eaves at the height of the neighbouring terraces, falls away from the shared boundary, conceals the photovoltaic array and matches the pitch of the surrounding roofscape. That decision is supported by national policy, which now names mansard roofs in terms; by the Council's own recent decisions in two conservation areas; and by a documented survey of six built examples within a three-minute walk, one of which stands alongside a Grade II* listed church.

Applying policy S4, the benefits of the scheme are substantial and the adverse effects are not. Planning permission should be granted.

Tudor Agencies

EMP-DAS-002 Rev B | September 2026