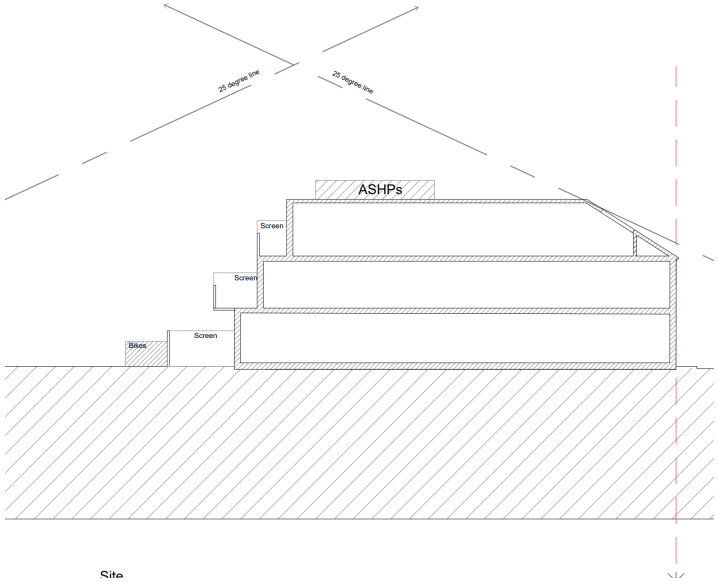
DESIGN & ACCESS STATEMENT

LAND OF EMPRESS DRIVE



Proposal : Development of land for ten residential units

Site Location: Garage Site Adjacent To 33 Empress Road Gravesend Kent

1. Introduction

This Design and Access Statement is submitted in support of a planning application for the redevelopment of the garage site adjacent to 33 Empress Road, Gravesend, Kent. The proposal entails demolishing the existing disused garages and constructing a three-storey block of ten residential flats (apartments) with rear balconies, along with associated access and parking provision. The application site lies within an established residential area of Gravesend and is currently an underused brownfield plot. It is situated in a sustainable location close to local shops, schools, and public transport routes, within walking distance of Gravesend town centre. The Gravesham Local Plan Core Strategy 2014 designates the site as within the urban area, and as previously developed land the principle of residential development is acceptable in this location. The National Planning Policy Framework (NPPF, 2023) also encourages making effective use of such land to deliver new homes in sustainable urban locations (Section 11 and Section 5 of the NPPF).

Planning Context: Pre-application advice (reference PRE20240129, dated 1st August 2024) was sought for an earlier iteration of this scheme. The Council's feedback identified concerns with the initial design's scale and its lack of contextual integration, advising that a more contextually appropriate design would be required. In particular, the pre-app response noted the original scheme was too bulky and out-of-character with the surrounding Victorian-era street scene, and that a revised proposal "that reflects the existing dwellings" (e.g. nearby traditional terraces or the flatted block to the south) "would be more appropriate for this site". This Design and Access Statement outlines how the proposal has been fundamentally redesigned in response to that feedback, adopting a traditional Victorian-style aesthetic and reduced massing to better suit the local context. It also demonstrates the scheme's alignment with relevant policies in the Gravesham Local Plan Core Strategy (2014) – notably Policies CS19 (Development and Design Principles) and CS18 (Climate Change) – as well as the NPPF (2023) in terms of design quality, sustainability, and amenity. The following sections address the design approach, sustainability strategy, access and parking arrangements, and measures to safeguard neighbouring amenity, before concluding on policy compliance and the merits of the proposal.

2. Design Approach

Design Concept and Contextual Integration: The revised design takes its cue from the surrounding Victorian-era terraced houses and the character of the local streetscape, ensuring the new building will be visually harmonious and locally distinctive. Empress Road and the nearby area are characterised by traditional 19th-century two-storey terraced properties with pitched roofs and ornate brick detailing. In addition, a three-storey residential block (Scotts Yard flats) lies to the south of the site, establishing a precedent for flatted development in the vicinity. The proposed three-storey flat block has been carefully designed to blend with this context, appearing as a natural extension of the street. The building's scale, bulk and massing have been moderated to respect the neighbouring terraced houses – for example, the top floor is set within a pitched roof with dormer windows, reducing the apparent height – and the façade articulation draws on traditional proportions. This approach directly responds to the Council's advice that development should incorporate the "scale, bulk and massing, together with design features of the surrounding dwellings" to be acceptable. By echoing the form and features of nearby buildings, the scheme will integrate well with the surrounding area in line with Local Plan Policy CS19, which requires new development to be visually attractive, locally distinctive, and to enhance the character of the local built environment. Likewise, the design accords with NPPF (2023) Chapter 12, which states that developments should add to the overall quality of the area, be visually attractive, and be sympathetic to local character.

Victorian-Inspired Architectural Features: The building adopts a traditional Victorian-style aesthetic, incorporating architectural elements typical of Gravesend's historic townhouses. Key design features include:

- Traditional Sash Windows: Tall, vertically-proportioned sash windows on the front elevation reflect the rhythm and style of windows on adjacent Victorian terraces. These not only reinforce the period character but also provide generous amounts of natural light and ventilation for the flats. The use of sash windows (with modern double-glazing) achieves the "charm of traditional timber sashes" while meeting contemporary performance standards as seen in local period refurbishments.
- Dormer Windows in Pitched Roof: The third storey is partially accommodated within a pitched roof form, punctuated by traditional dormer windows. The dormers are designed with gabled fronts and lead or slate cladding, mirroring those found on historic rooftops. This strategy reduces the building's perceived bulk by recessing the top floor into the roof, ensuring the new block does not overwhelm the two-storey houses next door. The pitched roof with dormers also adds visual interest and blends the roofline with the surrounding mix of pitched roofs.
- French Doors and Rear Balconies: At the rear, upper-floor flats will feature French doors opening onto modest balconies. The French doors have a traditional style (glazed double doors with a Juliette railing appearance on smaller openings, or leading to balcony decks on larger ones), complementing the overall design. The balconies themselves are of a simple metal railing design, positioned within recesses/offsets so as not to protrude excessively. They provide private amenity space for residents while being designed with privacy screens to the sides to prevent direct views into neighbouring gardens (as discussed in Section 5 on Neighbouring Amenity).
- High-Quality Brickwork Exterior: The exterior will be faced in brickwork characteristic of local town houses, likely a yellow London-stock brick or red brick to match the prevailing materials of Empress Road (to be agreed exactly to ensure a seamless match with No.33 and the existing Scotts Yard flats). Brick detailing will be used to add interest, such as decorative string courses or

contrasting lintel arches above windows, drawing from Victorian detailing. This traditional brick façade ensures an "aesthetically harmonious integration with the locality" and reflects the historic material palette of Gravesend.

- Pitched Roof with Decorative Cornices: The roof is a pitched design (slate or slate-effect tile finish to echo traditional roofs), with gable ends and eaves that line through with the neighbouring terrace. At the roofline, decorative cornices or brick eaves detailing will be introduced where appropriate – for example, a subtle brick cornice band or moulded parapet detail along the top of the front elevation – to emulate the cornices and parapet details seen on Victorian buildings. These embellishments reinforce the period style without appearing pastiche, lending elegance to the façade. Additionally, the roof pitch and form are designed to mirror the angle of adjacent roofs, ensuring cohesion in the street-scene.

Collectively, these design features establish a period-appropriate appearance for the new building that "reflects the older properties in the street-scene", as was recommended in the pre-application feedback. The intention is for the flats to be indistinguishable in quality and character from a well-preserved Victorian era development, thereby preserving the character of the area. At the same time, the building will be constructed with modern techniques and meet all current standards, so residents benefit from both classic aesthetics and contemporary comfort. For instance, the traditional sash-style windows will likely be high-performance uPVC or timber with double glazing, and the building's structure will meet modern thermal and fire safety standards, which provides the look of yesteryear with the quality of today.

Streetscape and Layout: The building is positioned to respect the existing urban grain. It will follow the established building line along Empress Road, aligning with the frontage of No. 33 and maintaining the rhythm of the street. The height of the proposed block (three storeys) transitions appropriately between the two-storey houses on Empress Road and the three-storey Scotts Yard flats to the south, acting as a sympathetic "stepping stone" in scale. The design deliberately avoids an unduly long or monolithic frontage by introducing vertical bays and variations in the roof (with the dormers), so that it reads as a series of well-proportioned elements rather than one large mass. This helps the block fit comfortably into a street of smaller terraced units. The front elevation features an entrance that is legible and in keeping – a centrally located door with a decorative lintel or small portico canopy, for example – which gives the building a clear residential identity on the street and breaks up the expanse of the façade.

On the site layout, the main bulk of the building occupies the Empress Road frontage, while to the rear of the block the site will accommodate parking and a communal amenity area (garden space). Soft landscaping has been integrated into the design around the building edges and in the rear courtyard to soften the development and provide greenery. Low brick boundary walls with metal railings (a common feature in Victorian terraces) or hedging are proposed in front of the building to define private patios for ground-floor units and continue the character of front garden spaces along the road. Additional planting (such as small ornamental trees or shrubs) is planned along the site boundaries and within the parking court to create a pleasant environment and help screen the development. This landscaping not only enhances the visual appeal but also contributes to a biodiversity net gain (see Section 3). In line with the pre-app recommendations, the scheme includes a shared amenity area at the rear – a small landscaped communal garden where residents can relax –

and dedicated cycle storage, both considered more appropriate use of space than simply hardstanding. Overall, the design approach strives to deliver a development that conserves and enhances the character of the local built environment by drawing on the positive aspects of the context, thereby meeting the expectations of Core Strategy Policy CS19 and the NPPF's design objectives.

Internal Layout and Quality: The internal arrangement of the flats has been designed to ensure a high standard of accommodation that meets modern needs while fitting within the traditional exterior form. Each of the 10 units will comply with the Nationally Described Space Standards (2015) and the Council's Residential Layout Guidelines (SPG2, 2020) for room sizes and layouts. (Notably, in the previous iteration, a few units fell marginally short of the space standards; these have been adjusted in the new scheme so that all units now meet or exceed the minimum space requirements, as required by Policy CS19's stipulation that development be "fit for purpose" and accord with the adopted residential space standards). The mix of units is intended to cater to local housing needs (e.g. a range of 1 and 2-bedroom apartments, subject to detailed planning), providing much-needed smaller homes in a sustainable town centre fringe location. Each flat is designed with a functional, efficient layout, good levels of natural light (thanks to large sash windows and glazed doors), and access to either a private balcony (for upper floors) or a small ground-floor patio, in addition to the shared garden space. This ensures future occupants will enjoy a comfortable living environment with adequate amenity space. Furthermore, the construction will allow for adaptability – for instance, the ground-floor units could be adapted for disabled access if needed, and walls are positioned to allow flexibility in use – aligning with Policy CS19's goal for developments to be adaptable to meet changing needs of users. In summary, the design marries a respect for historic architectural style with contemporary standards of living, producing a development that is both characterful and high-quality.

3. Sustainability Strategy

The proposal embraces sustainability principles in both its construction and its long-term operation, consistent with Gravesham Core Strategy policy (CS18: Climate Change) and the NPPF's emphasis on mitigating climate change. A range of measures are incorporated to reduce the development's environmental impact and to ensure energy-efficient, future-proof homes:

- Low-Carbon Heating – Air Source Heat Pumps (ASHP): Each apartment will be served by an air source heat pump system (or a communal ASHP serving multiple units) for space heating and hot water. ASHP technology absorbs heat from the outside air to efficiently heat the interiors, significantly reducing reliance on fossil fuels. This modern electric heating solution can substantially cut carbon emissions and energy costs for residents compared to traditional gas boilers. By using heat pumps, the development aligns with the UK's transition to low-carbon heating and meets the intentions of Policy CS18, which encourages new developments to incorporate renewable or low-carbon energy sources. The outdoor ASHP units will be discreetly located (for example, to the rear of the building or on flat roof sections, away from street view) and acoustically treated if necessary to ensure they do not create noise disturbance for occupants or neighbour's.

- Solar Photovoltaic Panels: The scheme will utilise the roof space for on-site renewable energy generation where feasible. Solar PV panels are proposed on the roof – likely on the south-facing or hidden rear-facing roof slopes – to capture solar energy and generate electricity for the development (such as powering communal lighting, the heat pumps, or shared services). The design will integrate these panels in a sensitive manner so as not to detract from the roof's appearance from street level. By incorporating solar panels, the development takes a proactive step to offset a portion of its electricity demand with clean, renewable energy, in line with national policy goals for sustainable development. Both the ASHP and PV installations demonstrate compliance with NPPF (2023) guidance on planning for climate change mitigation, contributing to a reduction in greenhouse gas emissions.
- Enhanced Building Fabric: In addition to these technologies, the construction will feature a high-performance building fabric to minimise energy consumption. The walls, roof, and floors will be highly insulated beyond basic Building Regulations requirements, and windows will be double-glazed with low U-values, all aiming to reduce heat loss. Air tightness will be carefully controlled to prevent drafts while ensuring appropriate ventilation through a mechanical ventilation with heat recovery (MVHR) system or trickle vents for good air quality. These passive design measures mean the flats will require less energy to heat and cool, complementing the active systems (ASHP and solar) to achieve overall excellent energy efficiency. The goal is to achieve a high Energy Performance Certificate (EPC) rating for all units, thereby lowering residents' utility bills and the project's carbon footprint.
- Water Conservation: The new dwellings will incorporate water-saving fixtures (such as dual-flush toilets, low-flow taps and showers) and possibly rainwater harvesting for landscape irrigation, to promote efficient water use. These measures support sustainable resource use in line with Policy CS18's objectives and help future-proof the homes against increasing water scarcity.
- Sustainable Drainage and Flood Risk: Although the site is not known to be in a flood risk zone, the development will implement sustainable drainage systems (SuDS) to manage surface water run-off. Hardstanding areas (like the parking court) will use permeable paving, which allows rainwater to infiltrate and reduces runoff rate, thereby minimising risk of surface flooding and protecting the capacity of the local drainage network. Roof water will be directed to attenuation features (such as an underground crate or oversized pipes) or water butts, slowing discharge into the drains. This approach accords with Policy CS18 and Kent County Council's drainage guidelines, ensuring that the scheme does not increase flood risk and ideally improves the existing situation (the current garage site likely being fully hard-paved with no attenuation).
- Biodiversity Enhancement: As part of the sustainability strategy, the proposal seeks to enhance the site's biodiversity value. The existing garage court has little to no greenery or ecological value. By introducing landscaped gardens, trees, and planting, the development will create new habitats and contribute to urban greening. Native and pollinator-friendly species will be used in planting wherever possible to support local wildlife. Bird nesting boxes and bat roost features could be installed on the building or retained trees (if any) to encourage biodiversity. The aim is to achieve at least a 10% net gain in biodiversity on-site, in line with the Environment Act 2021 requirements for new development. A preliminary ecological appraisal will inform the detailed landscaping plan to ensure this net gain target is met. This may include measures like wildflower border planting or a small rain garden area that provides both drainage and habitat benefits. Delivering a biodiversity net gain not only meets emerging statutory obligations but also improves

the environmental quality of the site for residents and neighbours, turning a barren paved lot into a greener, more attractive space.

Overall, the sustainability features embedded in the design demonstrate a strong commitment to environmental responsibility. By combining low-carbon technologies (ASHP and solar) with a robust building envelope and site-wide environmental enhancements, the development will significantly reduce its carbon footprint and resource usage. This aligns with both local policy (Core Strategy CS18: Climate Change provisions) and national policy (the NPPF's presumption in favour of sustainable development and climate change mitigation). In summary, the scheme will deliver modern homes that are energy-efficient, eco-friendly, and resilient, contributing to Gravesham's broader objectives for sustainable growth.

4. Access and Parking

Vehicular Access: Access to the site for vehicles will be provided via Empress Road. The existing entrance (currently a gated opening to the garage court) will be utilised and upgraded to serve the new development. The entranceway will be widened as necessary and appropriate visibility splays will be ensured so that drivers can safely enter and exit the site. Empress Road is a narrow residential street; accordingly, the design will ensure that the new access is as unobtrusive and safe as possible. The boundary wall or fences near the driveway will be kept low or set back to improve sight lines, and a turning area is provided within the site so vehicles can enter and leave in a forward gear. The internal drive will likely be a shared surface courtyard at the rear of the building, with clear demarcation for pedestrian pathways. Adequate lighting will be installed along the access route and parking area for safety, using down-lit bollards or wall-mounted lights that direct light downward to avoid glare to neighbours. The access has also been reviewed in light of the pre-application feedback: during the initial consultation, it was noted that creating a rear access could be challenging due to the narrow road and potential impact on neighbours from vehicle movements. In response, the scheme has been designed to minimise disturbance – for example, by positioning the access lane slightly away from the adjacent property boundaries where feasible and adding acoustic fencing/landscaping (see Section 5) – and by keeping traffic levels low (only residents' vehicles). Furthermore, the sustainable location of the site means car dependency will be reduced (many residents may not need a car), lessening the frequency of vehicle movements. The applicant has explored the possibility of a "no parking" or low-car development as suggested by the Council; however, a minimal level of on-site parking is proposed to cater for residents' needs while still encouraging alternative transport use.

Parking Provision: A limited number of off-street parking spaces will be provided within the site, located at the rear of the building. The current design anticipates around 5 parking bays (final number subject to detailed layout), including at least one disabled-accessible space for blue badge holders. By providing a modest amount of parking (approximately 0.5 space per unit), the scheme strikes a balance between offering some convenience for residents with cars and avoiding excessive vehicle presence. This level of parking is in line with local parking standards for a sustainable town location and is mindful of the KCC Interim Guidance Note 3 and Gravesham's adopted parking standards (SPG4, 2006) which allow lower parking ratios in accessible sites. Importantly, the on-site parking will prevent additional strain on the already limited on-street parking in the area. The parking court is

tucked out of sight from Empress Road (behind the building), ensuring cars do not dominate the street-scene. The court will be landscaped with perimeter planting to soften its appearance and provide a buffer to neighbouring gardens. Electric vehicle charging points will be installed for the spaces (at least one active EV charging unit and infrastructure for others to be easily added later), in line with modern requirements and to promote the use of electric cars among future occupants. A management plan can be put in place, if necessary, to allocate and control the use of the parking (for example, ensuring spaces are used by residents only).

Given the site's proximity to the town centre and public transport, the development also embraces a sustainable transport approach. The number of parking spaces has been deliberately kept low, reflecting that many daily trips can be made by walking, cycling, or public transit. This approach is supported by the pre-application advice which indicated that a car-free or reduced-parking scheme would be appropriate in this sustainable location. Should the Council prefer a fully car-free development, the applicant is open to discussing a planning condition or obligation to restrict future occupants from obtaining residential parking permits, thereby formalising the low-car ownership model.

Cycle Storage: To encourage cycling and provide for residents who do not drive, secure bicycle storage is integrated into the site design. A dedicated cycle storage shelter is planned, with capacity for at least 10 bicycles (one per unit), and potentially more to accommodate one per bedroom in line with Council guidance. The cycle store will be covered, weather-proof, and lockable, ensuring bikes can be stored safely and conveniently. Its location will be easily accessible from both the street and the building – likely situated at ground level towards the rear/side of the building or within the entrance courtyard – to promote daily use of bicycles. By providing high-quality cycling facilities, the development aligns with Gravesham's sustainable transport objectives and the NPPF's aim to support alternative modes of travel. In addition, pedestrian access to the site and building is designed to be straightforward: a new footpath from Empress Road will lead to the main entrance, and the site layout ensures pedestrians can move from the street, to the building, to the parking/cycle areas safely separated from vehicles.

Inclusive Access: The scheme has been designed to be inclusive and accessible for all potential users. The main entrance to the apartment block will have a level threshold (step-free access), allowing wheelchairs, prams, and those with limited mobility to enter with ease. Communal corridors and doorways will comply with Part M of the Building Regulations for width and manoeuvring space. An audio-visual entry system will be installed at the secure lobby, aiding both security and accessibility (allowing occupants to remotely grant access to visitors/deliveries, which is beneficial for less mobile residents). Within the building, all ground-floor flats are designed to meet M4(2) accessible and adaptable dwelling standards – meaning features like slightly wider doorways, reachable window heights, and bathrooms that can be adapted with grab rails if needed. While a lift is not strictly required for a three-storey structure of this scale, the building has been designed with a centrally located stair core that could accommodate a future lift installation if necessary (space can be safeguarded for a lift shaft), ensuring the upper flats could be made wheelchair-accessible in the future. In the interim, the stair will be designed with easy-going risers and a continuous handrail for safety. Externally, routes to and around the building (to the bins, bikes, etc.) will be level or gently ramped, with non-slip surfacing, making it easy for all residents to move around. The layout has also

been checked for emergency access: fire appliances can approach to within the required distance from all parts of the building via Empress Road and the rear access (the distance from the road to the furthest flat entrance will be within the 45m hose range, or a dry riser will be installed if needed).

Refuse and Servicing: A designated refuse storage area is provided on site to handle waste and recycling for the development. A communal bin store, large enough for the requisite number of bins (general waste, recycling, and food waste) for 10 flats, will be located near the site entrance, adjacent to Empress Road. Placing the bin store close to the highway ensures easy collection – the Council's waste collection team can perform kerbside pickup, which is feasible given the site's street frontage. The bin enclosure will be sensitively designed, enclosed by robust timber fencing or brick walls to screen the bins from view and contain any odours. It will also have a simple access gate to allow residents to deposit rubbish and for bins to be wheeled out on collection day. By consolidating refuse storage in one accessible location, the scheme meets the Council's waste requirements and avoids bins cluttering the street. Likewise, deliveries (mail, parcels, etc.) can be conveniently made at the main entrance or the dwelling doors; there is space off-street for a delivery van to pull in briefly if needed without obstructing Empress Road.

In summary, the access and parking strategy for the development prioritises safety, convenience, and sustainability. The scheme provides appropriate vehicular access and a small amount of on-site parking to meet essential needs, but strongly encourages the use of walking, cycling, and public transport given the excellent location. It also ensures inclusive access for all residents and visitors. By following guidance from the highways authority and the pre-application feedback (which suggested a low-car approach and strong cycling provision), the proposal's access design is both sensitive to its context and in line with relevant policies (Core Strategy Policy CS11 on transport and the NPPF's promotion of sustainable transport). The end result will be a development that is well-integrated into the existing movement network, causes no harm to highway safety or convenience, and offers future occupants a choice of travel modes and easy access to services.

5. Impact on Neighbouring Properties

A careful assessment of potential impacts on neighbouring properties has guided the design, to ensure the development is neighbourly and does not adversely affect the amenity of adjacent residents. The immediate context includes No. 33 Empress Road (a two-storey end-terrace house) to one side, other terraced houses along Empress Road, and some dwellings to the rear (including properties on Scotts Yard and surrounding streets). The proposal has been formulated in accordance with Gravesham Core Strategy Policy CS19, which requires new development to safeguard the amenity of its occupants and those of neighbouring properties – including considerations of privacy, daylight and sunlight. It also aligns with paragraph 135(f) of the NPPF (2023), which seeks a high standard of amenity for existing and future users. The following measures have been incorporated to address key issues of overshadowing, overlooking, and general impact:

Daylight/Sunlight and Overshadowing: The building's height and placement have been designed to minimise any loss of light to adjacent homes. Although the new block introduces a third storey, its

impact is mitigated by the roof design and siting. The pitched roof slopes downward toward the sides and rear, meaning the effective height at the boundary with No. 33 is closer to two-storey eaves level, reducing any sense of excessive height next to that property. The bulk of the third floor is set back within the roof (via dormers), avoiding a full three-storey wall directly abutting the neighbouring house. Additionally, the new building does not extend significantly beyond the rear of No. 33; its rear building line is designed to align roughly with or only slightly beyond the rear elevation of the adjoining house, thus avoiding casting long shadows into No. 33's backyard or windows. A preliminary sunlight/daylight analysis indicates that the development will fall below the 45-degree lines taken from the nearest neighbouring windows (a common rule of thumb for preserving light), suggesting compliance with the Building Research Establishment (BRE) guidelines for daylight and sunlight. Any minor overshadowing that does occur (for example, early morning shadowing toward the adjacent side due to orientation) will be limited in extent and duration, and well within acceptable limits for an urban setting. There are residential properties to the rear (south-east) of the site as well, separated by a distance and by gardens; by keeping the new block's footprint relatively compact and central to the site, the design maintains reasonable separation so that those rear properties will continue to receive ample daylight and not experience undue overshadowing of their gardens. Overall, the scheme avoids the overbearing and overshadowing form that the initial proposal was feared to create– instead of a sheer three-storey mass, the stepped and pitched design allows sunlight to penetrate around it. In winter months when the sun is lower, any shadow cast will mostly fall within the site's own curtilage or onto the rear parking/garden area rather than neighbouring habitable spaces. Therefore, the daylight and sunlight amenity of surrounding homes is effectively safeguarded.

Privacy and Overlooking: Protecting the privacy of neighbouring residents has been a top priority in the layout and fenestration design. The incorporation of rear balconies in the scheme has been handled sensitively to prevent harmful overlooking. Each rear balcony is relatively small in depth and will include obscure-glazed privacy screens on the sides (facing towards the immediate adjoining neighbours' gardens). These screens, likely frosted glass or a solid panel, will block sideways views, ensuring that residents using the balconies cannot directly look into the adjacent gardens of No. 33 or other nearby private areas. The primary outlook from the balconies is directed to the rear of the site, over the proposed communal garden and parking area. The separation distance from the back of the new block to the rear boundary is designed to be as generous as the site allows (anticipated to be on the order of 15–20 meters to the nearest rear property fence). While slightly below the ideal 21m back-to-back distance recommended in some guidelines, this distance coupled with the use of the privacy measures and landscaping is considered sufficient to avoid intrusive overlooking, especially since any facing houses to the rear are offset rather than directly aligned window-to-window.

Moreover, the window placement on the new building has been carefully considered: no clear-glazed windows are placed on the side elevations facing directly toward No. 33's side or any other adjacent dwelling's primary windows at close range. The flank wall facing north (toward No. 33) will either have no windows or only high-level/obscured windows (for bathrooms or secondary rooms) to prevent any direct line of sight. The same goes for the opposite flank if it faces another property's boundary. The majority of windows are on the front (toward the street) and rear (over the site's own area), which are directions that pose minimal privacy concerns. Front windows face the public realm of Empress Road where overlooking is not an issue (it mirrors the existing situation of houses facing each other

across the street). Rear windows and doors face into the site; although upper-floor rear windows could afford views toward gardens of houses beyond, the angles and distance are such that any view will be oblique and partial. Additionally, new boundary treatments and planting will help screen ground-floor and lower-level views: for instance, new trees or tall shrubs at the rear boundary will filter views from first-floor windows toward neighbouring gardens, and a robust boundary fence (likely 1.8-2m close-boarded timber) will block ground-floor sight lines. By these design choices, the proposal ensures that no undue overlooking or loss of privacy will occur to existing residents, addressing the concerns raised at pre-app stage about previous designs causing privacy loss. Internally, the layout of rooms in the new flats also takes into account privacy – primary living room windows are oriented to the front or rear, whereas any side-facing elements are kept to secondary spaces, further reducing potential overlooking.

Outlook and Overbearing Impact: The massing has been broken down to avoid any looming or oppressive effect on neighbours. Instead of a flat blocky facade, the building's elevations are articulated with setbacks and a varied roof profile. For example, the top floor being within the roof reduces the visible wall height when seen from the gardens or windows of adjoining properties, making the structure appear more akin to a 2½ storey building. The roof hips/slopes at the edges ensure that the highest point of the building is toward the middle of the site, not at the boundary, which greatly diminishes the sense of bulk when viewed from next door. The design also includes some step-back at the rear corners: the rear balconies are inset into the building rather than cantilevered out, which means the rear facade has portions that step in, further reducing the mass at the extremes. The resulting form is more modulated and will prevent a "wall effect" along the boundary. From No. 33's perspective, the new block will read as a natural continuation of the terrace line, slightly taller but not excessively so, and with architectural interest that catches the eye (windows, brick detailing) rather than a blank flank. By keeping a respectful distance and not building along the entire boundary length, the proposal also maintains some openness around the site. Neighbours will still have a view of sky and the new landscaped areas when looking towards the site, rather than just building mass. In essence, the relationship of the new building with its surroundings has been designed to be comfortable and proportional, such that it will not be overbearing or unduly dominate the outlook from nearby dwellings. This was a key revision from the earlier scheme which was deemed too overbearing; the current proposal addresses that by both reducing scale and adding architectural relief in the form.

Noise and Disturbance: The potential for noise impacts on existing residents, both during construction and in use, has been assessed. While residential use is generally compatible with a residential area (certainly quieter than some possible commercial uses), specific attention has been paid to the layout of parking and mechanical plant to minimise disturbance. The parking area is now confined to the rear of the site and will be separated from neighbouring gardens by new acoustic fencing (a close-boarded fence, possibly with an acoustic membrane, about 2m high) and landscaping. This will help dampen sounds from car engines, doors shutting, and the occasional vehicle movement. Given the small number of parking spaces (and likely staggered usage by residents), traffic noise on site will be infrequent and comparable to normal residential activity. Additionally, the site access was scrutinised to avoid headlights shining into neighbours' windows at night – the alignment is such that headlights will primarily shine down the access within the site or onto Empress Road, not directly into adjacent houses. The communal areas (like the shared garden) will be used by residents for passive recreation;

these are not expected to generate significant noise, but their presence in the rear also means that any late-night gatherings would be effectively self-policed by the residents (who have a stake in keeping noise reasonable). In terms of building services, all plant equipment (such as the external ASHP units) will be specified to meet strict noise criteria. The ASHP units can be mounted on anti vibration mounts and positioned away from critical boundaries – for instance, on the rear ground level with fencing, or on the roof set back from the edges – to ensure their hum is not perceptible at the nearest dwellings. Any necessary noise attenuation (acoustic enclosures or screening) will be implemented to comply with environmental health standards for plant noise. Internally, the new flats will be constructed with high levels of sound insulation (meeting or exceeding Building Regulations Part E for sound between dwellings), which also benefits neighbours as the containment of sound within the new building means less leakage to the outside.

Construction Management: Although not a permanent impact, construction will be managed to limit disruption to the neighbourhood. Working hours will be restricted to normal daytime hours to avoid early morning or late evening noise. Deliveries will be coordinated to avoid school run hours (if applicable) and peak times on Empress Road. Dust and dirt will be controlled with appropriate measures (like damping down, wheel washing facilities) to prevent nuisance to nearby homes. A Construction Management Plan can be agreed with the Council to formalise these arrangements. By proactively planning the build process, the development team will ensure the construction phase has minimal impact on the amenity of surrounding residents.
In conclusion, the neighbouring amenity considerations have been central to the refined design. The proposal now demonstrates full regard for the privacy, light, and comfort of adjoining occupiers, in line with development plan policy and NPPF expectations. Specifically, overshadowing and overbearing effects have been avoided through sensitive scaling and siting; overlooking has been mitigated via thoughtful orientation and screening; and noise/disturbance will be negligible with the planned safeguards. The result is a scheme that coexists peacefully with its surroundings. The applicant is confident that the development will “safeguard the amenity··· of neighbouring properties” as required by Policy CS19 and will provide a high standard of amenity for existing and future residents alike, thereby resolving the issues identified in the pre-application stage regarding the earlier design’s neighbours impacts.

6. Conclusion

This revised proposal for a ten-unit residential development at the former garage site on Empress Road represents a thoughtfully designed, contextually appropriate, and policy-compliant scheme. Through an iterative design process and in direct response to the Council’s pre-application advice, the development now embodies a traditional Victorian-inspired character that is in harmony with the surrounding streetscape. The changes made – including the introduction of sash windows, dormer roof features, matching brick materials, and scaled-down massing – ensure the building “reflects the existing dwellings” in the area as recommended by the planning officers. By doing so, the scheme addresses previous concerns about bulk and appearance, and it enhances the character of the locality in line with Gravesham Core Strategy CS19 and NPPF design principles.

The development will transform an underutilised brownfield site (a gated garage court) into a beneficial use, delivering 10 new homes in a sustainable urban location. This contributes to the Borough's housing supply objectives (Core Strategy Policies CS02 and CS15) and aligns with the NPPF's aim to significantly boost housing supply in appropriate locations. The design approach demonstrates a high standard of architecture that pays homage to Gravesend's Victorian heritage while providing modern living standards. In doing so, it meets the test of being visually attractive and locally distinctive, and creates a sense of place that residents can take pride in.

The sustainability strategy embedded in the proposal – featuring low-carbon energy and ecological enhancements – showcases the project's commitment to environmental responsibility and compliance with CS18 (Climate Change). Future residents will benefit from energy-efficient homes with lower running costs and enjoy a greener site with communal amenity space, all of which support Gravesham's development vision for quality and sustainability.

Crucially, the scheme has been designed not just for the benefit of its occupants, but also with full consideration of its impact on neighbours and the community. The layout and form mitigate potential negative impacts, ensuring no undue harm to the privacy, light, or tranquility of adjoining properties. This careful balancing of development needs with neighbourly respect reflects good planning practice and the high standard of amenity sought by both local and national policy. The introduction of new landscaping and the retention of a low-rise profile at the site's edges means the development will likely improve the immediate environment (replacing a barren, disused plot with an attractive residential building and gardens) without appearing intrusive.

In policy terms, the proposal now accords with the Gravesham Local Plan Core Strategy (2014): it satisfies Policy CS19 by delivering a well-designed scheme that respects local character and safeguards amenity; it supports Policy CS18 through on-site renewable energy and sustainable design measures; and it is consistent with other relevant policies (such as CS15 on density, given the site's urban location, and CS11 on transport by promoting sustainable transport choices). The development also adheres to the principles of the National Planning Policy Framework (2023) – it achieves sustainable development by balancing social (housing delivery), economic (efficient use of land), and environmental (heritage-respecting design and climate mitigation) objectives. Specifically, it fulfils the NPPF's guidance on well-designed places (Chapter 12) by enhancing the area's visual appeal and being sympathetic to local character, and on promoting sustainable transport (Chapter 9) by reducing reliance on the private car. The proposal has evolved to fully embrace these policy directives, ensuring that it can be supported on planning grounds.

The applicant has shown a willingness to engage and adapt the proposal in line with Council feedback and planning policy. The resultant design is persuasive on its merits: it offers high-quality new homes that fit comfortably into their context, improves a currently neglected site, and incorporates sustainability and accessibility for long-term benefit. We believe the scheme is a positive addition to Empress Road and will contribute to the ongoing regeneration and housing needs of Gravesend in a manner sensitive to local character. This Design and Access Statement has demonstrated how the proposal responds to and addresses all key considerations – from design aesthetics and functionality to access and neighbour amenity – and how it aligns with the Gravesham Local Plan Core Strategy (2014)and the NPPF (2023).

In summary, the revised development fulfils the recommendations of the pre-application process and constitutes a well-considered proposal that meets planning policy requirements. The development is therefore respectfully commended to the Council for favourable consideration. The applicant looks forward to continuing to work with the planning authority to deliver this scheme and is committed to ensuring that the final development will be one that both new residents and the existing community can be proud of.

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