

**LONDON BOROUGH OF SOUTHWARK**

**DESIGN AND ACCESS STATEMENTS SUPPLEMENTARY  
PLANNING DOCUMENT (SPD)**

**STATEMENT OF COMPLIANCE AND SUSTAINABILITY  
STATEMENT**

**JULY 2007**

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# 1. Introduction

## **What is the Design and Access Statements Supplementary Planning Document (SPD)?**

Design and access statements became a legal requirement for many types of development from 10 August 2006. Design and access statements explain the evolutionary process and thinking behind the final design; show how the proposal has taken into account its surrounding area. It demonstrates how it will improve the environment; and that the proposal has considered the needs of everyone. The SPD provides clarification on how to write, read and use design and access statements to promote a high quality designed and accessible development. It provides a framework for assessing the quality of the design and access information submitted.

## **What is the Design and Access Statements SPD Consultation and Sustainability Statement?**

This document, the Consultation and Sustainability Statement explains the consultation that was undertaken on the draft SPD and how comments received have been taken into account. This document covers the topics the Government requires us to report on, as set out in Section 18 of The Town and Country Planning (Local Development) (England) Regulations 2004.

This document also explains how we have considered sustainability issues in the preparation of the plan and the steps we have taken to ensure that the plan has positive impacts on the environment, community and economy. It also explains how we will monitor the SPD. Each of the topics required by Section 16 of the Environmental Assessments of Plans and Programmes Regulation 2004 have been covered.

A summary of all the comments received and council officer responses to them has been prepared and is included for information in Appendix 3.

## **Where to get more information**

You can download a copy of the SPD and the accompanying sustainability report from the council's website at the following address:

<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/DesignandAccessSPD.html>

Copies are also available by contacting the Planning Policy Team: Regeneration department, Southwark Council, Chiltern House, Portland Street, London, SE17 2ES. Email: [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) or telephone 020 7525 5418

## 2. STATEMENT OF COMPLIANCE

### What were the stages of consultation?

The following table explains when each of the consultation stages required by the council's draft Statement of Community Involvement (SCI) took place.

Requirement of SCI (for SPDs)	When did it occur?
Consult on SA/SEA Scoping Report (5 weeks)	August 2006
Prepare Consultation Plan	August 2006
6 week informal consultation on draft SPD and SA/SEA Report	25 January to 15 March 2007
6 week formal consultation on draft SPD and SA/SEA Report	16 March to 27 April 2007
Prepare Consultation Statement	July 2007

### Who was consulted and how?

The following table demonstrates how the consultation that has been carried out complies with the requirements of the council's draft Statement of Community Involvement.

		Stage in consultation	
		SA/SEA Scoping Report	Draft SPD
<b>Statutory requirement</b>	Mailout to statutory consultees (see Appendix C of draft SCI)	See Section 5.	January 25 <sup>th</sup> 2007 SPD mailout (see Appendix 3)
	Displaying documents at council offices	This stage was not a statutory public consultation	SPD, EqIA, SA report distributed to all libraries, council offices, Willowbrook / Town Hall / one stop shops, housing offices (see Appendix 2)
	Advertisement in local press	This stage was not a statutory public consultation	Advertisements were placed in the South London Press during the week commencing 12 March 2007. The availability of the document, and details of the time and place where the documents were available for inspection, representation forms, guidance notes on how to make representation forms and information setting out how to access the document in a number of formats and languages were also included in the notification. A copy of the notice is included at Appendix 2.
	Putting document on council website	This stage was not a statutory public consultation	25 January 2007. The draft SPD, Sustainability Appraisal (SA), and Equalities Impact Assessment (EQIA) were published on our website, along with advice on where and when paper copies were available for inspection. Representation forms and guidance notes on how to make representation forms were also made available on our website.

		Stage in consultation	
		SA/SEA Scoping Report	Draft SPD
<b>Additional Requirements from SCI</b>	Written notification to residents and interest groups, explaining: what the SPD is, where to obtain a copy of the SPD and supporting documents	The council notified Natural England, English Heritage and the Environment Agency.	25 January 2007. Sent to ward councillors, local groups mailing list and all parties submitting representations to the first draft Design SPG in 2002. (Appendix 3 summarises the local groups) Letter explained the availability of the SPD, and details of the time and place where the documents were available for inspection.
	Presentations to community councils	This stage was not a statutory public consultation	All community councils were offered presentations and information stands about the SPD. The following accepted the offer: Walworth Community Council – 8 February 2007, Bankside and Borough Community Council – 21 February 2007, Peckham Community Council – 13 March 2007, Dulwich Community Council – 13 March 2007, Bermondsey Community Council – 21 March 2007.
	Presentations to area housing offices	This stage was not a statutory public consultation	Copies of the document were displayed in each local office. Some Area Housing offices chose to receive a presentation on the SPD. These were: Bermondsey West Area Forum – 27 February 2007, Walworth Central Area Forum – 14 February 2007, Camberwell East Area Forum – 2 April 2007, Camberwell West Area Forum – 10 April 2007, Walworth East Area Forum – 11 April 2007, Bermondsey East Area Forum – 11 April 2007.
	Presentations to Equalities and Diversity Panel	This stage was not a statutory public consultation	Stage 1 of the EQIA was due to go to Equalities and Diversity Panel 16 <sup>th</sup> January 2007 but the meeting was cancelled. The document was emailed to all of the panel for comments. The Equalities team is satisfied with Stage 2 and 3.

<b>Stage in consultation</b>		
	<b>SA/SEA Scoping Report</b>	<b>Draft SPD</b>
Presentations to Planning Committee	Scoping report attached as a appendix to the committee report..	Draft SPD, EqIA, Consultation Plan and Sustainability Report, presented to Planning Committee on 6 <sup>th</sup> February 2007. Revised draft SPD, EQIA, Sustainability Report, Consultation and Sustainability Statement and Officers Table of Responses to Representations to be presented to Planning Committee 31 <sup>st</sup> July 2007.
Translations of documents supplied	Only statutory consultees were consulted.	One request was received for an audio version of the document. This was sent out 14 March 2007.
Consultation comments and officer responses made available	To be posted on the website	All parties submitting representations were written to on the 28 June 2007 advising of consultation and officer comments document on the website. Also advised in the letter of committee dates for Planning Committee and Executive.
Follow up letter sent to responders advising of decision to adopt		All parties submitting representations will be written to following Executive on 5 September 2007.

**How many comments were received?**

Three groups made representations to the draft SPD. One was objecting to the whole SPD. One was in support of the SPD but with the request for one addition to the SPD and the third made no formal comments on the SPD.

### **3. Summary of issues raised**

A total of three representations were received. The council has taken these representations into account in preparing the revised draft of the SPD (each representation and the council's response is set out in full in Appendix 4). The three representations were:

1. Supporting the SPD but would like theatre buildings to be mentioned within the document in terms of applicants seeking advice from a specialist access consultant when dealing with theatres.
2. No formal comments on the SPD except to note the Secretary of State's direction on Southwark's emerging Unitary Development Plan with regards to Lifetime Homes standards.
3. Objecting to the whole SPD on the basis that existing guidance adequately covers design and access statements.

### **4. Summary of officer comments**

If adopted, the SPD will be a significant material consideration in the determination of planning applications. It accords with the policies in the London Plan and will be adopted to the policies in the emerging Southwark Plan once it is adopted on the 26<sup>th</sup> July 2007.

There have been no changes to the SPD as a result of the three representations received. The reasons for this are set out below:

- Representation requested a specific reference to theatres and advising applicants to seek advice from a specialist access consultant. The officer response sets out that the SPD provides generic advice for all uses and that theatres are covered within all uses. The council's access officer already provides access advice on planning applications where necessary.
- Representation requested there be no SPD as existing guidance already covers design and access statements. The officer response sets out that there is a need for guidance specific to Southwark.
- Representation noting the direction on Lifetimes Homes. The SPD does not refer to Lifetimes Homes as this will be covered in the Residential Design Standards SPD.

A full database of officer comments to the representations is included in Appendix 4.

## 5. Summary of Sustainability Appraisal (SA) methodology

A Sustainability Appraisal (incorporating a Strategic Environmental Assessment) is carried out as part of the preparation of the SPD. This is to assess what impacts the SPD is likely to have on economic issues such as access to employment, social issues such as reducing crime and environmental issues such as reducing the risk of flooding. The aim is to ensure these issues are considered from the start of preparing the SPD so that it has the best possible outcomes.

### How have sustainability considerations been part of the process of making the SPD?

There are five stages involved in undertaking a sustainability appraisal. The table below outlines the steps taken in considering the sustainability impacts of the plan and how these fit in with the process of making the SPD:

Stage in sustainability appraisal	When did it occur?	Related SPD Stage
<p><b>Stage A:</b> This involved:</p> <ul style="list-style-type: none"> <li>– reviewing related plans and programmes;</li> <li>– collecting information to describe the borough as it is now and identify how it may change in the future; and</li> <li>– deciding on the key sustainability issues that the appraisal will focus on.</li> </ul> <p>It included the preparation of a scoping report that highlighted the key issues being considered early on in the SPD process and explained how the plan would be appraised.</p>	<p>This stage began in June 2006.</p> <p>Consultation on the scoping report began on 14 August 2006 and all consultees responded by 6 October 2006. Comment was sought from the Environment Agency, the Countryside Agency, English Nature and English Heritage.</p>	<p>Pre-production and evidence gathering</p>
<p><b>Stage B:</b> This involved testing the likely impacts of the SPD on the environmental, economic and social issues set out in the scoping report. Usually there are a few different approaches that could be taken to guiding development. These are called options. The likely impacts of different options were tested and compared.</p>	<p>This took place in September-December 2006.</p>	<p>Preparing and refining draft SPD</p>
<p><b>Stage C:</b> This involved preparing a Sustainability Report, which sets out the process taken to appraise the SPD and the findings of this appraisal. The report is considered by councillors when they agree the draft SPD for consultation.</p>	<p>This was completed in January 2007.</p>	<p>Finalising the draft SPD and getting councillor agreement to consult on the draft.</p>
<p><b>Stage D:</b> This involved consulting on the sustainability report. It is also provided for comment by the public with the SPD.</p>	<p>Consultation on the Sustainability Report took place between 25 January and 27 April 2007. All members of the public were invited to comment.</p>	<p>Consultation on the draft SPD.</p>
<p><b>Stage E:</b> This stage involves considering comments made during the consultation stage and making final amendments to the draft SPD. Any significant changes to the SPD will need to be appraised.</p> <p>A report is prepared setting out how the public's comments have been dealt with and identifying what difference the</p>	<p>Consideration of representations took place in May and June 2007.</p> <p>The Sustainability Appraisal has not needed to be changed as a result of the consultation.</p>	<p>Considering outcomes of consultation.</p>



appraisal process has made.		
Once the plan has been agreed (adopted), its social, economic and environmental impacts will then be monitored through the council's annual monitoring report.	Monitoring of the SPD will take place once it has been adopted in September 2007.	Adoption and monitoring of final version of the draft SPD.

More details of the process taken are provided in the Sustainability Report.

## 6. How has the plan changed as a result of the sustainability appraisal process?

The sustainability appraisal process has been an important companion to the plan making process. It has fed into each stage of the preparation of the draft SPD, initially helping to identify the issues that the draft SPD needs to respond to.

Later stages of the appraisal process have identified how the draft SPD would be improved or modified to provide a more sustainable outcome. This has included ensuring the SPD focuses on reducing greenhouse emissions and improving air quality.

### How has consultation influenced to preparation of the plan?

The sustainability appraisal scoping report was consulted on from 14 August 2006 and comments were received from all consultees by 6th October 2006. Comments received from this consultation were used to modify the appraisal process and the sorts of issues that were considered. A summary of the comments received on the scoping report, council officer responses to these and how they influenced the preparation and appraisal of the SPD are set out in the Sustainability Report.

Section 3 and 4 of this report (and Appendix 4) set out how comments received from consultation have been taken into account, and how they have influenced the final version of the SPD.

### How has the Sustainability Report been taken into account?

The Sustainability Report identified ways in which the draft SPD could be improved and implemented so that it has a more positive impact. The Sustainability Report concluded that through the implementation of the SPD there were no negative impacts on the sustainability objectives. However, there were some areas where minor positive impacts could be maximised to have a greater impact. These are listed in the table below along with an explanation about how these have been taken into account.

Recommendation	Response
Increase the positive impact the SPD has on biodiversity and wildlife and ensure that is protected as part of the proposal	Paragraph 4.1.5 refers to what applicants need to consider in designing the landscaping of the development. Further information on biodiversity and wildlife is contained within the draft Sustainable Design and Construction SPD.
Potential for the SPD to have a more positive impact on tourism through the improvement of the design and access of the borough having a potential positive impact for increased tourism in the borough.	The SPD will raise the standard of design and access in new developments. There is not scope within the SPD to refer to tourism specially.
Increase the positive impact on greenhouse gases by applicants being required to look at transport modes and sustainable transport	There is a strong focus on transport throughout the SPD, including in sections 4.1.3 and 4.1.7.
Improving air quality through the SPD	Section 4.1.6. of the SPD. Added in that by using renewable energy technologies the impact of the development on air quality will also be reduced.

## 7. What options were considered in the preparation of the draft SPD?

Three options for the site were identified and appraised. These were:

- **Option A:** No SPD. Use the guidance set out in the GDPO, the Circular and the CABA guidance to assist in writing, reading and understanding design and access statements. This option would also have relied on policy 3.12 of the Southwark Plan, which briefly states that a design statement is needed for most applications.
- **Option B:** A leaflet elaborating on policy 3.12 of the Southwark Plan and the guidance in the GDPO, the Circular and the CABA document.
- **Option C:** Produce a SPD to provide further guidance on policy 3.12 of the Southwark Plan and the guidance in the GDPO, the Circular and the CABA document.

The likely significant effects of each of these options were compared. This helped the council to develop a preferred option for producing guidance on design and access statements.

### **Option C forms the basis of the version of the SPD that is recommended for adoption.**

This option has been chosen because it was seen to produce the most positive contribution to sustainability. Without the document there is not a consistent approach taken to design and access statements. The main advantages of the SPD in relation to sustainability are:

- It will ensure developments are designed to be accessible to a wide range of transport choices – public transport, cycling and walking – and not just by the car.
- It will have a positive impact on climatic factors, including water, air and natural resources. The draft SPD requires applicants to consider sustainable urban drainage (SUDS), impact on air quality, and using renewable energy resources and increasing energy efficiency.
- It will have a positive impact on reducing crime and fear of crime by requiring applicants to consider how to design out crime and minimise fear of crime within their developments.
- It will promote a high quality of urban design, including protecting conservation areas, listed buildings and other protected areas and buildings.
- It will help to challenge discrimination against certain groups of the community by requiring inclusive access to all of society, regardless of mobility.
- It will work alongside other council documents, particularly the Statement of Community Involvement (the SCI) and the emerging Southwark Plan, in promoting community involvement in the planning process.

More detail on the likely impacts of the draft SPD and each of the options considered is provided in the Sustainability Report.

## **8. How will the SPD be monitored?**

Monitoring allows the council to identify if planning policy is having the intended outcomes and impacts. The Sustainability Report identified possible ways that the SPD could be monitored once it is adopted. These are still considered to be the most effective way of monitoring the plan.

The most appropriate mechanism with which to monitor the draft SPD is the Local Development Framework Annual Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of the council's planning policy and guidance and what effects this development is having in terms of sustainability.

The monitoring framework used for the AMR includes indicators that measure the significant effects of development in the borough. Key indicators that will be useful for monitoring the effects of the SPD include the following: transport modes of travel; accessible facilities for the mobility impaired; people involved in consultation; aggregated Index of Multiple Deprivation; renewable energy infrastructure; recycling and composting facilities; Secured by Design certification; crime and fear of crime; and indicators relating to listed buildings, conservation areas and Archaeological Priority Zones. As the SPD seeks to maximise the sustainability of development, it is considered that the existing set of indicators be used to measure the actual effects of the plan.

The SPD will also be monitored through the development control team. Applications received without a design and access statement will not be validated. Applications received with a design and access statement that does not meet the requirements set out in the SPD may be refused. Furthermore comments are received on many applications from the Council's Access Officer. Together this will monitor whether the SPD has made it clearer to applicants as to what is required in a design and access statement.

## Appendix 1: List of statutory consultees

Organisation
London Fire & Civil Defence
Metropolitan Police
The National Trust
Bromley Council
DEFRA
Department of Health
Highways Agency
Lambeth Council
Lewisham Council
London Transport Buses
National Grid Company Plc.
Womens National Commission
British Telecommunications
British Waterways Board
Church Commissioners for England
Civil Aviation Authority
Commission for Architecture & Built Environment
Commission for Racial Equality
Corporation of London
Countryside Agency (South East Region)
DEFRA - GO South East
Department of Trade and Industry
Department of Trade and Industry
Diocesan Board of Finance
English Heritage (London Region)
English Nature
Environment Agency
Equal Opportunities Commission
Forestry Commission
Government Office for London
Greater London Authority
H.M. Prison Service
Health and Safety Executive
Highway Agency
Housing Corporation (through Government Offices)
Housing Corporation (through Government Office's)
LFEDA
London Ambulance Service
London Ambulance Service NHS Trust
London Development Agency
London Fire and Emergency Planning Authority
London Fire Brigade
London Transport Buses
London Underground
Metropolitan Police Service Property Services
National Disability Council Secretariat
National Grid
Network Rail

<b>Organisation</b>
Port of London Authority
Southwark Friends of the Earth
Southwark Police
Sport England - London Region

## Appendix 2: Copy of advertisement

### NOTICE OF FORMAL CONSULTATION ON THE DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD) FOR DESIGN AND ACCESS STATEMENTS

#### Planning and Compulsory Purchase Act 2004

*Notice of formal consultation on the draft Supplementary Planning Document for*

*Design and Access Statements*

The purpose of the draft Supplementary Planning Document (SPD) for Design and Access Statements is to provide guidance to expand and support development plan policies concerning design and access. The draft SPD sets out the council's approach to preparing Design and Access Statements in the London Borough of Southwark to promote sustainable development. Once adopted the SPD will be a material consideration in assessing planning applications in Southwark.

The draft SPD for Design and Access Statements and supporting documents (including Equalities Impact Assessment and Sustainability Appraisal) are now available for formal public consultation from **March 14 to April 25 2007**.

### How to comment

If you would like to make comments on the draft SPD, you can do so by filling in a representations form and sending it by post to Alison Squires, **Planning Policy, Southwark Council, Chiltern House, Portland Street, SE17 2ES** or by e-mail to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)

Representation forms and guidance notes on how to make comments are available from Chiltern House free of charge, from March 14 2007 **between 9:00am and 5:00pm Monday to Friday**. They are also available from libraries, area housing offices, one-stop shops and on the council's website at: <http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/designandaccessSPD.html>

Alternatively, you can request a representation form from the planning policy team on 020 7525 5614 or email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk).

If you submit a representation you can request to be notified at a specified address of the adoption of the SPD for Design and Access Statements.

### Deadline for submitting comments

All comments on the draft SPD for Design and Access Statements and supporting documents (including Equalities Impact Assessment and Sustainability Appraisal) must be received by **5pm Wednesday April 25 2007**.

## Viewing the draft SPD for Design and Access Statements

Southwark Council's draft SPD for Design and Access Statements and supporting documents (including Equalities Impact Assessment and Sustainability Appraisal) are available to view at the following locations from March 14 2007:

### **Website (Available 24 hours. 7 days a week)**

<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/localdevelopmentframework/Section106draftSupplementaryPlanningDocument.html>

### **Council offices (*Opening times 9am-5pm Monday-Friday*)**

- Town Hall - Peckham Road, London, SE5 8UB
- Chiltern House - Portland Street, London, SE17 2ES

### **Libraries (*Opening times listed individually below*)**

- Blue Anchor Library - Market Place, Southwark Park Road, SE16 3UQ  
(Monday, Tuesday and Thursday 9am to 7pm, Friday 10am to 6pm, Saturday 9am to 5pm)
- Brandon Library - Maddock Way, Cooks Road, SE17 3NH  
(Monday 10am to 6pm, Tuesday and Thursday 10am to 7pm, Saturday 10am to 5pm)
- Camberwell Library - 17-21 Camberwell Church Street, SE5 8TR  
(Monday, Tuesday and Thursday 9am to 8pm, Friday 10am to 6pm, Saturday 9am to 5pm)
- Dulwich Library - 368 Lordship Lane, SE22 8NB  
(Monday, Thursday and Friday 9am to 8pm, Tuesday 10am to 8pm, Saturday 9am to 5pm Sun 12pm to 4pm)
- East Street Library - 168-170 Old Kent Road, SE1 5TY  
(Monday and Thursday 10am to 7pm, Tue 10am to 6pm, Sat 10am to 5pm)
- Grove Vale Library - 25-27 Grove Vale, SE22 8EQ  
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)
- John Harvard Library - 211 Borough High Street, SE1 1JA  
(Monday, Tuesday and Thursday 10am to 7pm, Wednesday and Friday 10am to 6pm, Saturday 10am to 2pm)
- Kingswood Library - Seeley Drive, SE21 8QR  
(Monday and Thursday 10am to 2pm, Tuesday and Friday 2pm to 6pm, Sat 1pm to 5pm)
- Newington Library - 155-157 Walworth Road, SE17 1RS  
(Monday, Tuesday and Friday 9am to 8pm, Thursday 10am to 8pm, Saturday 9am to 5pm Sunday 10am to 2pm)
- Nunhead Library - Gordon Road, SE15 3RW  
(Monday, Tuesday and Thursday 10am to 7pm, Friday 10am to 6pm, Saturday 10am to 5pm)
- Peckham Library - 122 Peckham Hill Street, SE15 5JR  
(Monday, Tuesday, Thursday and Friday 9am to 8pm, Wednesday 10am to 8pm, Saturday 10am to 5pm, Sunday 12pm to 4pm)
- Rotherhithe Library - Albion Street, SE16 7HY  
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)

### **Area Housing Offices (*Open 9am- 5pm Monday - Friday*)**

- Nunhead and Peckham Rye - 27 Bournemouth Road, Peckham, SE15 4UJ
- Dulwich - 41-43 East Dulwich Road, SE22 9BY
- Borough and Bankside - Library Street Borough, London, SE1 0RG
- Camberwell - Harris Street, London, SE5 7RX
- Rotherhithe - 153-159 Abbeyfield Road, Rotherhithe, SE16 2LS

**One Stop Shops (Open 9am-5pm Monday – Friday)**

Peckham one stop shop - 122 Peckham Hill Street, London, SE15 5JR

Walworth one stop shop - 151 Walworth Road, London, SE17 1RY

Bermondsey one stop shop -17 Spa Road, London, SE16

Copies of the draft SPD for Design and Access Statements and supporting documents (including Equalities Impact Assessment and Sustainability Appraisal) are available on request. Contact: Planning policy team, Chiltern House, Portland Street, SE17 2ES. Tel: 020 7525 5614 (between 9am-5pm, Monday-Friday),

Email: [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk).



### Appendix 3: Local consultees

All individuals, groups and organisations on the Planning Policy consultation database were sent a letter about the draft SPD consultation. This comprised:

Type of organisation	Number
Business	655
Community	1289
Health	30
Media	1
Resident	194
Individual	193
School	89
T&RA	181



#### Appendix4: Table of representations and officer comments

	Name / Group	Supporting / Support / Omission	Section/s and paragraph/s	Objection	Suggested changes	Officer Comments
1	The Theatres Trust – Rose Freeman	Supporting and omission	All	<p>Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and expect therefore to see matters relating to cultural facilities.</p> <p>The Theatres Trust supports this SPD and the recognition by Southwark of the role played by planning which seeks to encourage best practice and promote a high quality and inclusive environment for all, irrespective of age, gender, mobility or impairment. We are keen to ensure that access needs are considered along side any alteration to a building and not seen as an add-on. The combination of design and access into a single document means that access considerations will not detract from the quality of the design, and that proposed schemes will not create inaccessible environments.</p> <p>However, our one reservation is that there is no mention anywhere of <b>theatre buildings</b>. Southwark has such a wealth of theatre buildings that although many of the points discussed would of course apply to most types of buildings, theatres are such a specific building type, with particular challenges in terms of disabled access, that we feel it would be useful to mention</p>	<p>We feel it would be useful to mention theatres specifically and we recommend that you advise all applicants to seek advice from a specialist Access Consultant.</p>	<p>Whilst there is a need for good access to theatres, this is also true to many other uses. The SPD provides generic advice for all uses (including theatres) and so there is no need to mention theatres specifically in the SPD. Furthermore, the Council's Access Officer provides advice on the access elements of planning applications where necessary.</p>

				<p>them specifically and we recommend that you advise all applicants to seek advice from a specialist Access Consultant. The Theatres Trust, as a matter of course, strongly recommends to applicants that they undertake an independent peer review exercise regarding the technical design and spatial configuration of theatre schemes and ways in which they might take this forward bearing in mind the need for client confidentiality. We are keen to ensure that proposed alterations, extensions, new build and planned alterations would be fit for purpose. Theatres are very complex buildings technically and do need to be very carefully planned both inside and out.</p>		
2	Supporting	All	<p>The Government Office for London has no formal comments to make on this document. However, I do note the recent direction issued by the Secretary of State with regard to Policy 4.2 of the draft UDP. As the direction requires the deletion of reference to 'Lifetime Homes' standards from</p>		<p>The SPD does not refer to Lifetime Homes standards. This will be covered in a subsequent Residential Design Standards SPD.</p>	

			<p>this policy, there may be subsequent amendments that are required to the SPD. These may be required to ensure consistency and appropriate references between documents, and also to meet Policy 3A.4 of the London Plan.</p>			
3	Bellway Homes-John Brindley	Objecting	All	<p>We feel that a Supplementary Planning document on Design and Access Statements is wholly unnecessary.</p> <p>The Department for Communities and Local Government Circular 02/2006 (Guidance on Changes to Development Control System) clearly sets out in section 3 the requirements for Design and Access Statements including the content of such statements and the detail to be included. Paragraph 60 clearly states:  <i>“The Design and Access Statement is a short report accompanying and supporting a planning application, to illustrate the process as led to the development proposal and to explain and justify the proposals in a structured way.”</i></p>	Based on the level of guidance already available on Design and Access Statements we would request that Southwark’s Supplementary Planning Document on Design and Access Statements is not taken any further, and is not published as a formal SPD.	There is a need for guidance specific to Southwark. Whilst there is existing guidance on design and access statements (as mentioned in the Circular and the CABE document) it is not specific to the borough of Southwark. The SPD will provide Southwark developers,

			<p>al Planning Authorities should have clear design and access policies as required by PPS1 and PPS12 and the Town and Country Planning (Local Development) (England) Regulations 2004. These require that Local Development Documents include policies relating to design and access. These should require a Design and Access Statement to help assess the design of the proposal against the relevant policies and proposals set out in Local Development Documents. PPS12 also emphasises that there should be no repeat of national planning policy in LDF documents.</p> <p>The Government's own advisor on design the Commission for Architecture and the Built Environment (CABE) have already produced guidance on Design and Access Statements entitled "Design and Access Statements How to Write, Read and USE them". They state that the guidance is intended as best practice guidance to accompany the circular. We therefore feel it is wholly unnecessary for Southwark to produce further supplementary planning advice on Design and Access Statements given that their UDP will have policies along with policies in the London Plan, requiring design and access statements to be submitted with applications. There is also the guidance contained within the Government Circular 02/2006 as well as CABE's supplementary guidance.</p>		<p>architects, consultants and householders clarity on what is required in a design and access statement. Whilst it follows similar lines to the CABE document, the SPD will be a material consideration in the determination of planning applications, whereas the CABE document will not. The SPD therefore serves a purpose of providing Southwark specific information and being a material planning consideration. It is a necessary SPD.</p>
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				Based on the level of guidance already available on Design and Access Statements we would request that Southwark's Supplementary Planning Document on Design and Access Statements is not taken any further, and is not published as a formal SPD.		
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