

Guidance on information requirements and validation



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Section 1

Introduction

1. This guidance document accompanies the Development Management policy annex on information requirements and validation. It replaces the following documents, which are cancelled with effect from 6 April 2010:
 - section 3 of Circular 01/2006 Design and Access Statements
 - all of Circular 02/2008 Standard Application Forms and Validation
 - all of *The Validation of Planning Applications: guidance for local planning authorities* (CLG, 2007)

Section 2

Standard application form

Scope of the 1APP form(s)

2. The Standard Application Form can be accessed by the applicant directly, through the Planning Portal via the following link: www.planningportal.gov.uk, or via a local planning authority link to the Planning Portal on their website. Alternatively, an application can be completed on a paper version of the form provided by the local planning authority. The form allows for all applications for planning permission, except those for mineral development, as well as associated consent types. These include:
 - Householder consents
 - Outline and full planning permission and approval of reserved matters
 - Listed building consent
 - Conservation area consent
 - Advertisement consent
 - Lawful Development Certificates
 - Applications for Prior Approval under the Town and Country Planning (General Permitted Development) Order 1995 (the GPDO)
 - Removal or variation of conditions
 - Consent under Tree Preservation Orders and Notification of proposed works to trees in conservation areas
 - Extensions to the time limits for implementing existing planning permissions; and
 - Non-material amendments to existing planning permissions.

Application types not covered by 1APP

3. The Standard Application Form cannot currently be used for applications for mining operations or the use of land for mineral-working deposits. Such applications should therefore be made on a form provided by the local planning authority until such time as a standard form may become available for minerals applications.

4. Applications made under the Planning (Hazardous Substances) Act 1990 for Hazardous Substance consent are not covered by the Standard Application Form. Such applications should therefore be made on a form provided by the local planning authority.

Applications for prior approval

5. Applications under the GPDO for prior approval are not subject to the provisions for applications to be made on a standard application form. However, the Standard Application Form can be used by applicants wishing to apply for a determination as to whether prior approval is required under parts 6, 7, 11, 24 and 31 of Schedule 2 to the GPDO. The statutory information requirements for prior approval applications are set out in the relevant parts of the GPDO.

Applications for works to trees/TPO

6. The standard application form should be used for applications for consent to cut down or prune trees under Tree Preservation Orders (TPOs). It may also be used for the notification of proposed works to trees in Conservation Areas.

Applications to amend or remove conditions (s.73)

7. Applications to amend or remove conditions can be made on the standard application form. The applicant will need to provide sufficient information to enable the local planning authority to identify the previous grant of planning permission and the associated condition(s) which the applicant is seeking to vary. The applicant will not be required to provide copies of the application, but it might assist the local planning authority's consultation and determination procedures if they provide copies of the original drawings. When developers are applying to vary approved plans, they should clearly indicate the full extent of the proposed changes across the site. The LPA should ask developers to provide supporting information only in relation to the change(s) sought; in most cases it will be appropriate to submit a supplementary statement to be read in conjunction with the documents that supported the original application.

Applications to extend existing planning permission

8. From October 2009, we have empowered planning authorities to extend the time limits for existing planning permissions. Applicants seeking to extend an existing planning permission should use the standard application form, which has been amended for this purpose. This is a temporary measure and only applies to permissions which were granted on or before 1 October 2009.

9. Except in cases where there is a need to comply with a statutory requirement in connection with the submission of the application, or a relevant change in policy or other material considerations which post-date the original application, we do not anticipate that any information additional to that which must be provided on the application form will be required in most circumstances.
10. Applicants seeking to extend the time limit for their existing permission are advised to refer to CLG guidance note *Greater Flexibility for Planning Permissions*, published in November 2009¹.

Applications to renew planning permission

11. If development does not commence within the time period specified in the decision notice granting planning permission, the application lapses. In such cases, the application needs to be renewed before development may commence. Applicants seeking to renew a planning permission need to submit a fresh application for planning permission on the standard application form.

Applications by the Crown

12. Applications by the Crown need to be made on the standard application form. Certain applications, however, are made direct to the Secretary of State. These are for urgent Crown development under section 293A of the Town and Country Planning Act 1990 and for urgent works relating to Crown land under section 82B of the Planning (Listed Buildings and Conservation Areas) Act 1990. These applications have to be submitted direct to the Planning Inspectorate together with a certificate stating that the proposed development is both of national importance and should be carried out as a matter of urgency. Full details are set out in paragraphs 26 – 37 of CLG Circular 02/2006, Crown Application of the Planning Acts.

Electronic vs. paper forms

13. Applicants are encouraged to apply electronically, via the Planning Portal website. However, online submission of supporting information may not always be possible because of its volume and variety. In these circumstances, information can be submitted in hard copy, or electronically on a CD or USB storage device, even if the application has been submitted via the Planning Portal. Applicants who submit hard copies of supporting information must provide the original plus three copies (a total of four copies). Applicants who choose to submit their application form

¹ CLG guidance note *Greater Flexibility for Planning Permissions*, November 2009. Available on the CLG website <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1388639.pdf>

and supporting information in different formats will be notified of the validity of their application when the local planning authority is satisfied it has received all the necessary information.

14. Applicants who submit an application electronically to the local planning authority can communicate in this way throughout the whole application process unless an alternative approach is agreed between the local planning authority and applicant. Where applicants have chosen to communicate electronically with the local planning authority, the Decision Notice can also be issued electronically.
15. For electronic applications, a typed signature of the applicant or Agent's name is acceptable.
16. Applicants are encouraged to submit an electronic copy of any document that was prepared electronically, to facilitate the determination process. For major applications, or files that are too large to upload via the Planning Portal, applicants should provide these on a CD or USB storage device. It may assist the determining authority if applicants provide more than one copy.

Number of copies of the form

17. The provisions in the GDPO specify that applications submitted electronically do not need to be accompanied by any further copies either of the application or accompanying information.
18. Applicants who apply for permission or consent on a paper copy of the standard application form must provide the original plus three copies of the form and any accompanying plans, drawings or information associated with the application (a total of four copies) unless the local planning authority indicate that a lesser number is required. Local planning authorities may request additional copies above the statutory requirement, but failure to provide these would not be a basis for refusing to validate the application.

Multiple applications

19. The standard application form allows applicants to apply for multiple consents at the same time: for example, to apply for planning permission and listed building consent, or planning permission and conservation area consent. The form has been designed so that the questions that appear do not duplicate information requests for more than one consent regime. A fee (where applicable) applies for each consent sought.

20. Use of the form for multiple applications which come under different consent regimes is intended to streamline the application process. However, it does not alter the fact that these applications are legally distinct and their validity and determination should be treated as such by the local planning authority.
21. At the end of the determination process, local planning authorities are advised to send the applicant one decision letter for each application for each consent regime. However, where a decision letter combining consents is sent, the different consents must be differentiated within the letter as they are still legally distinct from one another.

Ownership certificates

22. Any hard copy certificate submitted with the standard application form must be signed by hand. For any electronically submitted certificate, a typed signature of the applicant's name is acceptable.

Equalities monitoring arrangements²

23. The Government does not intend as part of the standard application form to prescribe the manner in which local planning authorities should monitor the impact of their policies and service delivery on specific groups or communities. However, monitoring is essential if local planning authorities are to address the needs of all sections of the community.
24. Monitoring should help planning authorities to fulfil the Government's aim to build sustainable and inclusive communities and to reduce social exclusion.
25. New monitoring arrangements may need to be introduced in the context of the new Equality Bill, scheduled for 2010. This aims to distil nine pieces of legislation into a single Act. A new Equality Duty is expected to be introduced for public bodies to tackle discrimination, promote equality of opportunity and encourage good community relations. The new duty will cover race, disability and gender as well as age, sexual orientation, gender reassignment and religion or belief, replacing the three existing duties with a single framework. This is due to take place during 2010.

² A good practice guide, *Diversity and Equality in Planning*, was published by ODPM in January 2005. This can be downloaded from the CLG website: <http://www.communities.gov.uk/publications/planningandbuilding/diversityequality>

Section 3

Validation: a more responsive approach

26. After the introduction of the standard application form, some LPAs developed validation processes that resulted in very high initial levels of invalidity. Some of this may have been due to poor quality applications. However, some LPAs may also have been too rigid in their validation requirements. A 'tick-box' approach to validation offers clarity for applicants in setting out which information items are required, but in some cases LPAs have applied this too mechanistically without taking individual scheme characteristics into account. LPAs are encouraged to ensure that validating officers have been sufficiently trained to identify what information is necessary for the purposes of validation.
27. LPAs should make proportionate requests for information, and should not use invalidation to prevent the start of the determination period where an applicant has taken reasonable steps to fulfil the information requirements set out on the local list.
28. For major development and other schemes which are likely to have significant impacts on the surrounding area (or further away), applicants should engage in pre-application discussions so that they are clear about the information that the LPA will need in order to understand the anticipated impacts of the application. The Government's policy on pre-application discussion is currently out for consultation and can be found in Part 3 of the draft Planning Policy Statement on Development Management³.
29. LPAs should not, when validating an application, amend the description of development without first discussing any revised wording with the applicant or their agent.
30. LPAs should acknowledge receipt of a valid application in accordance with Article 5(2) of the GDPO.
31. If a planning application is deemed invalid, the validating officer should notify the applicant of their reasons in writing, unless it is clear that the omissions could be addressed rapidly, in which case it may be more efficient to make contact with the applicant by telephone or email. If the applicant disagrees with the officer's reason(s) for invalidating the application, he or she should first discuss with a higher level officer at the LPA. If the dispute cannot be resolved with the LPA, and more than 8

³ This can be found on the CLG website: <http://www.communities.gov.uk/publications/planningandbuilding/developmentmanagementconsult>

weeks have passed since the application was submitted for determination (or 13 weeks, for major applications), the applicant may have the right to appeal against non-determination on the grounds of invalidity after 8 or 13 weeks (as applicable) as discussed further in paragraph 37. In cases where the applicant has not provided an item or items specified in the GDPO or listed on the LPA's published list, there is no right of appeal⁴. Applicants who want to challenge a decision of invalidity in such a case must consider other procedures, such as a claim for judicial review on legal grounds.

32. Local planning authorities should start the determination process as soon as a valid application is received. A valid application is registered on the day of receipt (Day zero). If the application has been submitted electronically it should be treated as having been delivered at 9am on the next working day after the day on which it is transmitted.
33. The time period from application to decision begins the day after a valid application and the correct fee (where applicable) have been received (Day one) regardless of whether the application is submitted electronically or in paper format. For prior approval applications, day 1 is the date of receipt of a valid application. This is unaffected by any requests for, or later receipt of, further information.
34. In some circumstances the supporting information may be inadequate or its quality may be a concern. These are not grounds for invalidating applications, but applicants are encouraged to submit information to a good standard since this will greatly assist the determination process. Local planning authorities have the ability to request clarification or further information during the determination process.
35. Where the local planning authority uses its powers to request additional information from the applicant, the 'clock' should not be stopped whilst waiting for further information. Normal determination periods should continue to apply unless a longer period is agreed in writing between the applicant and local planning authority to extend the determination period. This represents a strong case for engaging in pre-application discussions so that the applicant gains a better idea in advance of what information is likely to be required by the local planning authority.
36. A direction to the applicant to provide further information should be made only when necessary to assist the local planning authority in its determination of an application and must not affect the validity of an application, where it has been validated and registered.

⁴ Relevant case law is *Newcastle City Council v SSCLG and Kayu Poostchi* (CO/9666/2009), 11 December 2009.

37. In cases where a fee in respect of an application is paid by cheque which is subsequently dishonoured or electronic payment which is declined, the start date for processing the application (day 1) is the day immediately after the local planning authority is satisfied that they have received the full fee.
38. Notwithstanding the advice in paragraph 34 above, local planning authorities occasionally do not validate applications on the basis that they consider the quality of the supporting information to be inadequate. In such circumstances, applicants may appeal to the Planning Inspectorate (PINS). PINS decisions on some of these 'non validation' cases can be made by way of a desk exercise and exchanges of correspondence.
39. Where it is found that an application was not valid because the information provided is wholly inadequate to enable a decision to be made, it reverts to the Authority for consideration. Except where the submitted material is wholly inadequate, such that the proposal is not reasonably capable of being understood, the appeal will be registered and an Inspector appointed. If the Inspector agrees with the applicant's view that adequate supporting information has been provided, the application is determined at appeal on its merits.

Section 4

Statutory national information requirements

40. The information required to make a valid planning application consists of:
- mandatory national information requirements specified in the GDPO, including a design and access statement where one is required⁵
 - information provided on the standard application form; and
 - information to accompany the application as specified by the local planning authority on their local list of information requirements.
41. The GDPO provisions are explained in this section.
42. The standard application form requires applicants to supply information on a range of issues, tailored to the type of application. Applicants should answer all the questions.
43. The additional supporting information is specified by each local planning authority in the form of a 'local list of information requirements'. Section 5 discusses these lists in detail.

Location plan

44. The GDPO⁶ requires applicants to submit "*a plan which identifies the land to which the application relates*". This is interpreted as a location plan and a site plan. Other plans may be requested by the LPA on their local list.
45. All applications must include copies of a location plan based on an up-to-date map. This should be at an identified standard metric scale (typically 1:1250 or 1:2500, but wherever possible the plan should be scaled to fit onto A4 or A3 size paper). The GDPO 1995 requires applicants to provide three copies plus the original (unless submitted electronically). Plans should identify sufficient roads and/or buildings on land adjoining the application site to ensure that the exact location of the application site is clear.

⁵ See Section 6 of this guidance for further details

⁶ Article 4E(1)(c)(i)

46. The application site should be edged clearly with a red line. It should include all land necessary to carry out the proposed development – for example, land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings.
47. A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site.

Site plan

48. A site plan should be submitted. The legislation requires three copies plus the original (unless submitted electronically). The site plan should be drawn at an identified standard metric scale. It should accurately show
 - a. the direction of North
 - b. the proposed development in relation to the site boundaries and other existing buildings on the site, with written dimensions including those to the boundaries

and the following, **unless these would NOT influence or be affected by the proposed development:**

 - c. all the buildings, roads and footpaths on land adjoining the site including access arrangements
 - d. all public rights of way⁷ crossing or adjoining the site
 - e. the position of all trees⁸ on the site, and those on adjacent land
 - f. the extent and type of any hard surfacing; and
 - g. boundary treatment including walls or fencing where this is proposed
49. Local planning authorities are reminded of the need to take a proportionate approach. Where it is clear that information would not be relevant to the determination of the application, it should not be required from the applicant. For example, it should not be necessary for an applicant to provide detailed information on elevations of existing buildings on the site if these will not be altered by the development proposal, or detailed information on site boundary treatments if these are entirely unaffected by the development.

⁷ Footpath, bridleway, restricted byway or byway open to all traffic

⁸ Guidance on Tree Preservation Orders was published in 2000 and amended in 2009. This can be found on the CLG website at www.communities.gov.uk/publications/planningandbuilding/tposguide and www.communities.gov.uk/publications/planningandbuilding/tposguideaddendum

Ownership certificates

50. Under section 65(5) of the Town and Country Planning Act 1990, read in conjunction with Article 7 of the GDPO, the local planning authority must not entertain an application for planning permission unless the relevant certificates concerning the ownership of the application site have been completed. All applications for planning permission must therefore include the appropriate certificate of ownership. An ownership certificate A, B, C or D must be completed stating the ownership of the property. For this purpose an 'owner' is anyone with a freehold interest, or leasehold interest the unexpired term of which is not less than seven years. Ownership certificates must also be completed for applications for listed building consent, and conservation area consent for demolition⁹.
51. These ownership certificates are part of the standard application form.

Notice(s)

52. A notice to all owners of the application site must be completed and served in accordance with Article 6 of the GDPO. As noted in paragraph 50 above, site owners are freeholders and leaseholders with at least seven years of the leasehold left unexpired.

Agricultural Land Declaration

53. All agricultural tenants on a site must be notified prior to the submission of a planning application. This is required by Article 7 of the GDPO. Applicants must certify that they have notified any agricultural tenants about their application, or that there are no agricultural tenants on the site. The certificate is required whether or not the site includes an agricultural holding. It is incorporated into the standard application form, and must be signed in order for the application to be valid.
54. No agricultural land declaration is required if the applicant is making an application for the approval of reserved matters, renewal of temporary planning permission, discharge or variation of conditions, tree preservation orders, conservation area consent for demolition, listed building consent, a lawful development certificate, prior notification of proposed agricultural or forestry development, a non-material amendment to an existing planning permission, or express consent to display an advertisement.

⁹ Required under Regulation 6 of the Planning (Listed Buildings and Conservation Areas) Regulations 1990

The correct fee

55. Planning applications incur a fee. These are described in CLG circular 04/2008, Planning-Related Fees. The Planning Portal includes a fee calculator for applicants. Each local planning authority is also able to advise applicants on specific cases.

Design and access statement, where required by GDPO

56. A design and access statement must be submitted for some types of planning application, and in some designated areas. The statutory requirements for design and access statements are set out in Article 4C of the GDPO, as amended. See section 6 for further details.

Updates to supporting documents

57. If an applicant needs to update a supporting document or plan which was submitted via the Planning Portal, **and the application has not yet been determined**, he or she should upload the replacement document or plan, ensuring that it is clearly labelled as such, and inform the local planning authority that a replacement document or plan has been uploaded.

Section 5

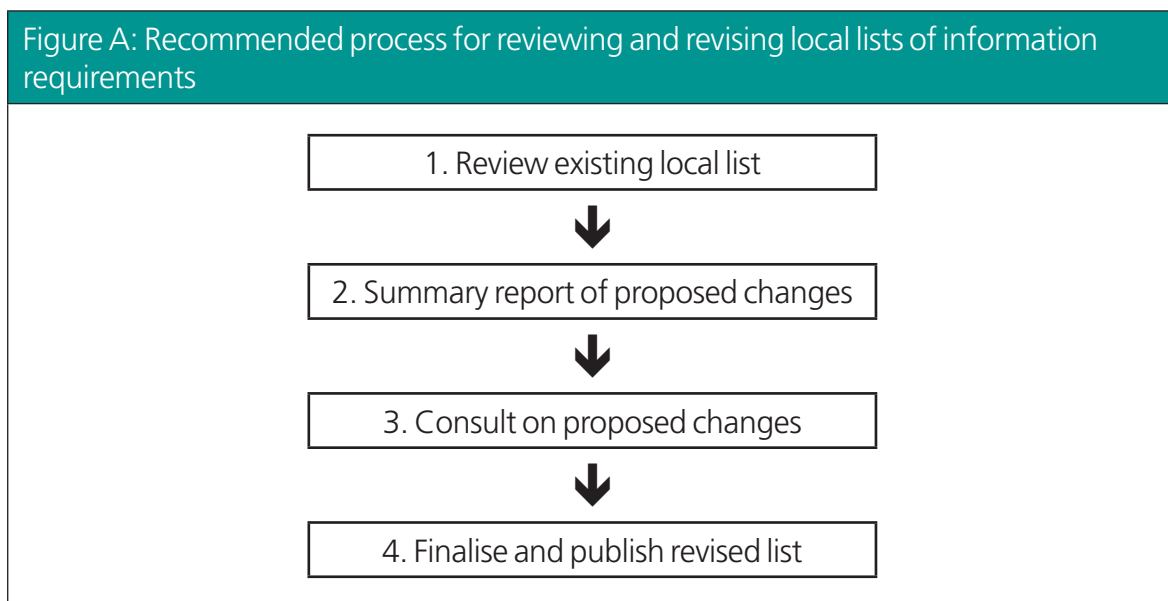
Local information requirements

Overview

- 58. Where a local planning authority already has a published local list on 6 April 2010, it should review it. Section 5.1 sets out the proposed review process. Authorities which have not published a local list should consider preparing one.
- 59. The policy statement on information requirements and validation sets out five principles which should inform the list preparation and review process. Section 5.2 explains how the principles should be used to inform the content and use of the local lists of information requirements.

5.1 Local list review process

- 60. Some local planning authorities already have very clear local lists of information requirements, and apply these in a proportionate way. Such authorities may only need to make minor amendments to their current list.
- 61. Other authorities may have to make significant changes to their local list.
- 62. Figure A shows an overview of the recommended list review process.



- 63. Each step is discussed in more detail below.

Step 1: Reviewing the existing local list

64. LPAs should identify the drivers for each item on their existing local list of information requirements, if these are not already stated. These drivers should be statutory requirements, national, regional or local plan policies, or published guidance that explains how adopted policy should be implemented.
65. LPAs with no existing local list should undertake a review of national, regional and local plan policies and identify the items of information which these policies require applicants to supply.
66. All LPAs should review national, regional and local planning policy to ensure that they haven't missed any recent policies.
67. Having identified the information requirements, local planning authorities should decide whether they need to prepare a new list or revise their existing local list, having regard to the principles and criteria set out in the Development Management Policy Annex on information requirements and in section 5.2 below.

Step 2: Summary report of proposed changes

68. The work undertaken in Step 1 should be summarised in a short report. This report should set out any changes that the LPA considers necessary. Where an LPA decides that no changes are necessary to its existing local list, it should publish an announcement to this effect on its website.

Step 3: Consulting on proposed changes

69. Where the LPA considers that changes are necessary, the proposals should be issued to the local community, including applicants and agents, for consultation. The consultation period should last no less than eight weeks.

Step 4: Finalising and publishing the revised local list

70. Consultation responses should be taken into account by the LPA when preparing the final revised list.
71. The revised local list should be approved by the LPA and published on its website. LPAs should ensure that there is a clear signpost on the planning homepage to the section of the website where the local list can be found.
72. Depending on the degree of revision that has been necessary, it may also be appropriate for the LPA to publish revised guidance notes for applicants.

73. When the LPA publishes its revised local list and any associated guidance notes, it should ensure that the date of publication is clearly visible. This is to confirm that the list has been revised to reflect the new policy.
74. LPAs should inform the Planning Portal of any changes that are necessary to their Planning Application Requirements (PAR) as a consequence of changes to the local list (e.g. downgrading the status of certain supporting documents from 'mandatory' to 'optional'). This is necessary to ensure that the information requirements for online applicants are updated to reflect the revised local list.
75. The whole process of reviewing, revising and publishing the local list should be completed by the end of December 2010 at the latest.

5.2 Local list content

Principles and criteria for list preparation and review

76. The policy statement on information requirements sets out five principles to guide the preparation and review of local lists, as shown in Table A, below.

Principle	Key considerations
Necessity	All local list requirements should be based on statutory requirements ¹⁰ , national, regional or adopted local policy, or on published guidance which explains how adopted policy should be implemented
Precision	It should be clear what types of development require the provision of particular supporting information. Where appropriate, the LPA should also identify specific areas where the information requirement arises.
Proportionality	The information required is likely to be dependent on the nature and scale of the proposal and the sensitivity of its location. Where possible, the LPA should identify size thresholds below which certain information is not required or where only limited information is required.
Fitness for purpose	It should be clear what information is required to satisfy the requirement – with a strong emphasis on a proportionate approach and succinct documents.
Assistance	For each element of the list it should be clear where further information or answers to queries can be obtained.

¹⁰ Other than the mandatory national requirements set out by the General Development Procedure Order (as amended), which need not be repeated on the local list.

Necessity

77. All local list requirements should be based on national, regional or adopted local planning policy, or statutory requirements other than the GDPO. The statutory requirements set out in the GDPO are already a national requirement, as discussed in section 4 above, and need not be repeated on the local list.
78. National policy includes planning policy statements (PPSs), planning guidance notes (PPGs), circulars and ministerial statements.
79. The current PPSs can be found on the CLG website at <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/>
80. The full range of PPGs can be found on the CLG website at <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicyguidance/> N.B.: this includes policy guidance notes which have been superseded by PPSs.
81. Other national planning policy documents can be found on the CLG website at <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/>
82. Regional policy is contained in regional spatial strategies. The Government Offices for the Regions include links to the eight relevant regional planning documents; their homepage is <http://www.gos.gov.uk/national/> . The relevant document for London, the Mayor's Spatial Development Strategy, can be found on the Mayor's website at <http://www.london.gov.uk/thelondonplan/>
83. To qualify for inclusion in the local list, local planning policies must have been published in adopted local development framework (LDF) documents. Each local planning authority publishes their LDF on their own website; hard copies may also be available. Policies which have been 'saved' from an old unitary development plan (UDP) may be relevant in the short term, but will be superseded as soon as the authority produces its LDF.
84. In addition, LPAs may make reference to published guidance which explains how adopted national, regional and local policy should be implemented.

Precision

85. It should be clear where (geographically) the information requirement arises. This will be most easily identified in relation to areas which are already designated by the local planning authority or other bodies (for example, flood risk areas, air quality management areas, conservation areas, town centres, settlement boundaries).
86. It should be clear what types of development require the provision of supporting information. Local planning authorities may wish to identify the most common forms of planning application that they receive, and include a particular emphasis on these in their local list. However, the determination of local information requirements should not be constrained or defined solely by application type: scale and context are also important.
87. The Arup and Addison & Associates report¹¹ suggested that *“there is scope [for local lists] to differentiate between different types of householder development, in order to reduce the information burden and improve accessibility of local lists for those not familiar with the planning system”* (paragraph 3.18). There may also be scope for differentiation between different types of minor development.

Proportionality

88. LPAs should adopt a proportionate approach. Some information may only be relevant in particular geographical contexts, or for specific types of planning application. Wherever possible, LPAs should set out the circumstances where a local list item **will** be required. Wherever possible, they should also set out the circumstances where a local list item **will not** be required. This is intended to provide greater certainty for applicants.
89. Where possible, the list should identify size thresholds below which the information is not required. For example, for householder and other minor development applications, it may be disproportionate to routinely request the submission of specialist technical reports.
90. In the past, some LPAs have taken a risk-averse approach and sought to impose a blanket requirement for the detailed technical reports referred to in some Planning Policy Statements. In some cases this is a disproportionate response. In revising their local lists, LPAs should focus on the principle of proportionality and not expect applicants to provide the highest levels of technical detail suggested in PPSs except for major or particularly sensitive development, where this may be appropriate.
91. Where possible, a graduated approach should be taken to the information required (e.g. dependent on the scale or sensitivity of the proposal). Local lists should reflect the fact that different scales of development may have different impacts, and – irrespective of the development size – that these impacts may vary depending on the characteristics of the site and surrounding area.

¹¹ Arup and Addison & Associates for CLG (2008) *Review of information requirements for the validation of planning applications*

Fitness for purpose

92. Local planning authorities should encourage applicants to aim for brevity in their applications, whilst providing the LPA with sufficient information to enable them to understand where the site is, what the development proposal is, and what the main impacts of the scheme would be. Applicants are reminded that they should provide a summary of their application: see policy INF 3 of *Development Management Policy Annex: Information Requirements and Validation* for further details.

Assistance

93. For each element of the list, it should be clear where any further information or answers to queries can be obtained. For example this may include hyperlinks to the relevant national, regional or local policy documents, the Planning Portal, the relevant historic environment record service, or any guidance produced by the local authority.

Plans

94. Depending on the nature, scale and context of the development, the LPA may wish to ask applicants for some or all of the following plans. These are not a statutory requirement under the terms of the GDPO but may be very useful in illustrating clearly what the development proposal comprises. **Requests for plans should be proportionate to the nature and scale of the development proposal, and should be expected to add to LPAs' understanding of the proposal.** All plans should be drawn at an identified standard metric scale. They should be named in a logical manner and given titles which refer to their content.
95. It **may** be appropriate for applicants to provide some or all of the following plans:
- Block plan of the site, showing: site boundaries; the type and height of boundary treatment (e.g. walls, fences), where a change is proposed; the position of any building or structure on the other side of such boundaries, where these could influence or be affected by the proposed development.
 - Existing and proposed elevations, showing clearly the proposed works in relation to what is already there, for any elevations that would be created or altered by the development proposal. These should indicate, where possible, the proposed building materials and the style, materials and finish of windows and doors. Where a proposed elevation adjoins another building or is in close proximity to it, the drawings should show the relationship between the two buildings and detail the positions of the openings on each property.

- Floor plans for new development, and for existing buildings altered by the proposed development. These should highlight any existing walls or buildings that are to be demolished, where applicable. If the application relates simply to a change of use, and no development work is to be carried out, a floor plan may not be necessary.
- Existing and proposed site sections and finished floor and site levels, where a change is proposed. These should show: how the proposed development relates to existing site levels and adjacent development (with levels related to a fixed datum point off site); details of existing and proposed foundations and eaves where a change is proposed; and how encroachment onto adjoining land is to be avoided.
- Roof plans for any roof that would be created or altered by the proposed development, showing the shape of the roof, its location, and specifying the roofing material to be used.

5.3 Presentational issues

96. Local planning authorities should present their local list of information requirements clearly and concisely. The revised local list may be most clearly presented in the form of a matrix of requirements.
97. Table B below presents an example matrix (for illustration only).

Table B: Illustrative format for revised Local List

Information item	Policy driver¹²	Types of application that require this information	Geographic location(s) where this info is required	What info is required	Where to look for further assistance
<i>Local list Item 1</i>	PPS99 para 3	All applications for over 1,000 sq m floorspace	<i>[LPA to complete]</i>	<i>[LPA to complete]</i>	<i>[LPA to complete]</i>
<i>Local list Item 2</i>	RSS Policy E4	'major major' applications	All	<i>[LPA to complete]</i>	<i>[LPA to complete]</i>
<i>Local list Item 3</i>	Core Strategy Policy A1	<i>[LPA to complete]</i>	<i>[LPA to complete]</i>	Statement explaining what the <i>[specific topic]</i> impact of the scheme will be and how the applicant proposes to mitigate this	<i>[LPA to complete]</i>
<i>Local list Item 4</i>	SPD Policy SD7	All except householder applications	Within AONB boundaries	<i>[LPA to complete]</i>	<i>[LPA to complete]</i>
Etc.					

¹² See paragraphs 77 to 84 section on Necessity) for further references to appropriate policy drivers

Section 6

Design and access statements

6.1 Legislative provision

98. Section 42 of the 2004 Act substituted a new section 62 of the 1990 Act and amended section 10 of the Listed Buildings Act so as to provide that a statement covering design concepts and principles and access issues is submitted with an application for planning permission and listed building consent. Section 42 also inserted a new section 327A into the 1990 Act, which prohibits, among other things, a local planning authority from entertaining an application unless it is accompanied by a design statement and an access statement, where such statements are required by section 62.
99. Article 4C of the GDPO and regulation 3A of the Listed Buildings Regulations set out the detailed requirements for a statement in relation to planning permissions and listed building consents respectively. One statement should cover both design and access, allowing applicants to demonstrate an integrated approach that will deliver inclusive design, and address a full range of access requirements throughout the design process.

6.2 Purpose

100. PPS1¹³ sets out the overarching planning policies on the delivery of sustainable development through the planning system. Good design plays a fundamental role in achieving this. As PPS1 states:
“Good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development. Good design is indivisible from good planning. Planning authorities should plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.”

¹³ Planning Policy Statement 1: *Delivering Sustainable Development* (ODPM 2005)

101. A design and access statement is a short report accompanying and supporting a planning application to illustrate the process that has led to the development proposal, and to explain the proposal in a structured way. The level of detail required in a design and access statement depends on the scale and complexity of the application, and the length of the statement varies accordingly. **Statements must be proportionate to the complexity of the application, but need not be long.**
102. Design and access statements help to ensure that development proposals are based on a thoughtful design process and a sustainable approach to access. Statements should improve the quality of proposals: in preparing the design and access statement, developers need to consider and subsequently explain the merit of the design and how it relates to the existing setting.
103. Design and access statements enable local planning authorities to better understand the analysis which has underpinned the design and how it has led to the development of the scheme. This helps negotiations and decision-making and should lead to an improvement in the quality, sustainability and inclusiveness of the development.
104. Design and access statements allow local communities, access groups, amenity groups and other stakeholders to involve themselves more directly in the planning process without needing to interpret plans that can be technical and confusing. This helps to increase certainty for people affected by development and improve trust between communities, developers and planners. It also enables the design rationale for the proposal to be more transparent to stakeholders and the local planning authority.
105. The PPS on climate change (December 2007)¹⁴ is a supplement to PPS1. As such, climate change considerations are integral to the planning system, including in the design of new developments. The PPS reminds applicants of the need to consider how their schemes can help to mitigate climate change and adapt to the climate that the development is likely to experience over the course of its expected lifetime. Design and access statements for outline and detailed planning applications should therefore demonstrate how climate change mitigation (through the minimisation of energy consumption, efficient use of energy, and the supply of types of energy including from low-carbon and renewable sources to help reduce overall carbon emissions) and adaptation measures (to provide resilience to future climate impacts) have been considered in the design of the proposal. These measures may be of particular relevance under the topic headings of amount, layout, scale, landscaping, context or access, depending on the nature of the proposed development and its anticipated impacts on the surrounding area. Applicants should refer to paragraphs 41 and 42 of the PPS1 Climate Change Supplement for further details.

¹⁴ Available on the CLG website; <http://www.communities.gov.uk/documents/planningandbuilding/pdf/ppsclimatechange.pdf>

106. The government has announced its commitment to update and revise the PPS on climate change, alongside the PPS on renewable energy (PPS22), and to consult publicly on a new consolidated PPS on these topics. More information on this revision will be available on the CLG website in due course, see www.communities.gov.uk.
107. It should be recognised that design and access statements are a communication tool. They cannot set, or justify, design and access policies and they cannot ensure high quality design and access by themselves. Local planning authorities should therefore 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 a local planning authority's local development documents include policies relating to design and access. They should use design and access statements to help assess the design of a proposal against the relevant policies and proposals set out in local development documents.

6.3 When a DAS is required

108. A design and access statement must accompany planning applications for both outline and full planning permissions, other than in the circumstances set out by Article 4C of the GDPO¹⁵. The elements to be described in design and access statements will be the same regardless of whether the application is for outline or full planning permission, but their scope will differ. What is required in both outline and detailed statements is explained below. Local authorities and applicants are reminded that the level of detail provided in the Design and Access Statement should be proportionate to the complexity of the proposed development and the sensitivity of its setting.
109. Design and access statements are required for all planning applications, with the following exceptions. Applicants are advised to refer to Article 4C of the GDPO for full details but, in summary, a DAS is **not** statutorily required for:
- i. engineering or mining operations
 - ii. development of an existing dwellinghouse, or development within the curtilage of a dwellinghouse for any purpose incidental to the enjoyment of the dwellinghouse, where no part of that dwellinghouse or curtilage is within a designated area
 - iii. a material change in the use of land or buildings, unless it also involves operational development
 - iv. extensions to the time limits for implementing existing planning permissions

¹⁵ This is amended by SI 2010/567

- v. development of an existing flat for any purpose incidental to the enjoyment of the flat as such, where no part of that flat is within a designated area
- vi. the extension of an existing building used for non-domestic purposes where the floorspace created by the development does not exceed 100 square metres and where no part of the building or the development is within a designated area
- vii. the erection, construction, improvement or alteration of a gate, fence, wall or other means of enclosure, up to 2m high or the height of the existing means of enclosure, whichever is the higher, where no part of the building or the development is within a designated area or the curtilage of a listed building
- viii. development on operational land consisting of the erection of a building or structure up to 100 cubic metres in volume and 15m in height and where no part of the development is within a designated area
- ix. the alteration of an existing building where the alteration does not increase the size of the building and where no part of the building or the development is within a designated area
- x. the erection, alteration or replacement of plant or machinery where, as a result of the development, the height of the plant or machinery would not exceed the greater of 15 metres above ground level, or the height of the original plant or machinery, and where no part of the development is within a designated area; or
- xi. development of land pursuant to section 73 (determination of applications to develop land without conditions previously attached) of the Town and Country Planning Act 1990.

Exemptions iv to xi come into force as a result of SI 2010/567 in April 2010. Table C (overleaf) sets out the new requirements in more detail.

- 110. In this context, “designated area” means a World Heritage Site or a conservation area.
- 111. Design and access statements are not required for applications relating to advertisement control, tree preservation orders or storage of hazardous substances. Neither are they required for applications for prior approval for proposed development, or non-material amendments to existing planning permissions.
- 112. Design and access statements **are** required for applications for listed building consent. These statements differ slightly in content, as discussed in more detail in section 6.9 below.

113. Once satisfied that the design and access statement meets the requirements of the GDPO, the local planning authority should place the design and access statement on the public register with the application to which it relates. Design and access statements should also be sent to consultees along with individual planning or listed building applications.

TABLE C: Design and Access Statements

Table C: Key changes in the requirements for design and access statements (April 2010)		
Type/location of application	Previous status	New status (from April 2010)
Householder development in World Heritage sites, Conservation Areas or requiring Listed Building consent	DAS required	DAS required
Householder development in National Parks, AONBs, the Broads or SSSIs	DAS required	DAS not required
Householder development outside of the areas listed above	DAS not required	DAS not required
Certain non-residential development ¹⁶ in World Heritage sites, Conservation Areas or requiring Listed Building consent	DAS required	DAS required
Certain non-residential development in National Parks, AONBs, the Broads or SSSIs	DAS required	DAS not required
Certain minor non-residential development outside of the designations listed above	DAS required	DAS not required
Applications for the removal or variation of conditions on existing permissions (s.73)	DAS required	DAS not required
Walls, gates, fences and other means of enclosure up to 2m in height in a World Heritage Site, Conservation Area or requiring Listed Building consent	DAS required	DAS required
Walls, gates, fences and other means of enclosure up to 2m in height, ¹⁷ outside of the designations listed above	DAS required	DAS not required
On operational land, the erection of certain buildings or structures ¹⁸ provided these are not in a World Heritage Site or Conservation Area or affecting a Listed Building	DAS required	DAS not required

¹⁶ Specified in article 4C(1)(e) of the GDPO (SI 1995/419), as amended by SI 2010/567

¹⁷ Specified in article 4C(1)(f) of the GDPO (SI 1995/419), as amended by SI 2010/567

¹⁸ Specified in article 4C(1)(g) of the GDPO (SI 1995/419), as amended by SI 2010/567

Table C: Key changes in the requirements for design and access statements (April 2010)		
Type/location of application	Previous status	New status (from April 2010)
On operational land, the erection of buildings or structures which are in a World Heritage Site or Conservation Area or affecting a Listed Building, or larger than the restrictions listed in the SI	DAS required	DAS required
Erection, alteration or replacement of certain plant or machinery ¹⁹ provided this is not in a World Heritage Site or Conservation Area or affecting a Listed Building	DAS required	DAS not required
Erection, alteration or replacement of plant or machinery which is in a World Heritage Site, Conservation Area or affecting a Listed Building, or larger than the restrictions listed in the SI	DAS required	DAS required

6.4 The status of the DAS and its role in decision-making

114. Design and Access Statements explain proposals already set out in the planning application, but they also set out the principles and concepts that will be used when that proposal is developed in the future. In particular, for outline planning permission, applicants and local planning authorities should consider how they will ensure the relevant parts of the statement are adhered to for the drawing up and assessment of future details. This may be as part of the consideration of an application for approval of reserved matters or any other matter reserved by condition such as materials or landscaping details.
115. Fixing the principles contained within the statement to future decisions is particularly relevant in the case of outline planning applications. Here, the local planning authority should ensure that the development approved by an outline planning permission is constrained to the parameters described in the design and access statement submitted with the application, and that any future decisions relating to that outline permission are consistent with the statement.

¹⁹ Specified in article 4C(1)(i) of the GDPO (SI 1995/419), as amended by SI 2010/567

116. In some cases information provided may need to be amended as designs are worked up, especially where they are not only setting out objectives for the building or space, but also a process to achieve these objectives. For example, information on inclusive access may increase with the scheme from initial concept right through to building regulation approval. Local planning authorities may feel that additional information, building on the original statement, is required at the reserved matters stage. In such cases it may be beneficial to include a condition to this effect in the outline planning application, as long as this is in accordance with other Government policy²⁰.
117. Design and access statements must not be used as a substitute for drawings or other material required to be submitted as part of the planning application. They provide an opportunity for developers and designers to demonstrate their commitment to achieving good design and ensuring accessibility in the work they undertake, and allow them to show how they are meeting, or will meet, the various obligations placed on them by legislation and policy.

6.5 Pre-application discussion

118. PPS1 advises that pre-application discussions are critically important and benefit both developers and local planning authorities in ensuring a better mutual understanding of objectives and the constraints that exist, and that local planning authorities and applicants should take a positive attitude towards early engagement in pre-application discussions. Although not specifically required by either the GDPO or the listed building regulations, it is considered good practice to use design and access statements as an aid to pre-application discussions, particularly for more complicated applications. Design and access statements can be a cost effective and useful way to discuss a proposal throughout the design process, whilst early discussion on the inclusive access component should help to establish any initial access issues.
119. Local planning authorities are urged to consult CABI at the earliest opportunity where they consider a proposal raises, or is likely to raise, significant design quality and access issues.
120. Applicants are also encouraged to consult CABI for further advice on good design, and to use available tools such as Building for Life to ensure that schemes are of high quality²¹.

²⁰ CLG's draft policy on conditions was published for consultation in December 2009. This can be found at Part 2 of the Draft PPS Annex on Conditions: <http://www.communities.gov.uk/publications/planningandbuilding/improvingplanningconditions>.

²¹ Further details can be found at: <http://www.buildingforlife.org/>

6.6 Presenting the information

121. A design and access statement can be presented in various formats. For most straightforward planning applications, the statement may be only short; for some only a page may be needed. For more complicated planning applications, a more detailed format and, perhaps, longer document is likely to be necessary. For larger or more challenging sites, the design and access statement may also include drawings and plans illustrating the various issues which the scheme has responded to.
122. However, **whilst its length and complexity may vary, what is important is that the document is concise and takes a proportionate approach, while effectively covering all of the design and access issues** for the proposed development. It is also acceptable to submit a design and access statement in other formats, for example electronically, unless a local planning authority specifically requires hard copy.
123. Design and access statements may include, as appropriate, plans and elevations; photographs of the site and its surroundings; and any other relevant illustrations. For large and complex schemes, a model of the proposed development in the context of its surroundings may also accompany the statement, but should not be a substitute for it. These illustrative materials must not be used as a substitute for adequate drawings submitted with the planning application.
124. Local planning authorities may need to make statements available in alternative formats (large print, audio tape etc) to comply with the requirements of section 21 of the Disability Discrimination Act 1995. Statements are placed on the public register and should be made available in alternative formats on request.

6.7 What is required: the design component

125. The design and access statement should cover both the design principles and concepts that have been applied to the proposed development and how issues relating to access to the development have been dealt with. Statements should evolve throughout the design and development process.
126. A design and access statement for a planning application should explain the design principles and concepts that have been applied to particular aspects of the proposal – these are the amount, layout, scale, landscaping and appearance of the development.

Amount

127. The amount of development is how much development is proposed. For residential development, this means the number of proposed units for residential use and for all other development, this means the proposed floor space for each proposed use.
128. Amount cannot be reserved within an outline application, although it is common to express a maximum amount of floorspace for each use in the planning application and for this to be made the subject of a planning condition. The design and access statement for both outline and detailed applications should explain the amount of development proposed for each use, how this will be distributed across the site, how the proposal relates to the site's surroundings, and what consideration is being given to ensure that accessibility for users to and between parts of the development is maximised. Where the application specifies a range of floorspace for a particular use, the reasons for this should be explained clearly in the design and access statement.

Layout

129. The layout is the way in which buildings, routes and open spaces (both private and public) are provided, placed and orientated in relation to each other and buildings and spaces surrounding the development.
130. If layout is reserved at the outline stage, the outline planning application should provide information on the approximate location of buildings, routes and open spaces proposed. The design and access statement accompanying an outline application should explain the principles behind the choice of development zones and blocks or building plots proposed and how these principles, including the need for appropriate access will inform the detailed layout. The use of illustrative diagrams is encouraged to assist in explaining this.
131. For detailed applications, and outline applications where layout is not reserved, the design and access statement should explain the proposed layout in terms of the relationship between buildings and public and private spaces within and around the site, and how these relationships will help to create safe, vibrant and successful places. An indication should also be given of factors important to accessibility of the site for users, such as travel distances and gradients, and the orientation of blocks and units in relation to any site topography to afford optimum accessibility. The layout of buildings can also have a profound impact on the energy consumption and thermal comfort during winter and summer, and thus the building's carbon emission performance.
132. PPS1 makes clear that a key objective for new developments should be that they create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion. Design and access statements for outline and detailed applications should therefore demonstrate how

crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in Safer Places- the Planning System and Crime Prevention (ODPM/Home Office, 2003). Further advice on 'Secured by Design' principles is available from the Police²².

Scale

133. Scale is the height, width and length of a building or buildings in relation to its surroundings.
134. If scale has been reserved at the outline stage, the application should still indicate parameters for the upper and lower limits of the height, width and length of each building, to establish a 3-dimensional building envelope within which the detailed design of buildings will be constructed. In such cases the design component of the statement should explain the principles behind these parameters and how these will inform the final scale of the buildings.
135. For detailed applications, and outline applications that do not reserve scale, the design and access statement should explain the scale of buildings proposed, including why particular heights have been settled upon, and how these relate to the site's surroundings and the relevant skyline. The statement should also explain the size of building parts, particularly entrances and facades with regard to how they will relate to the human scale.

Landscaping

136. Landscaping is the treatment of private and public spaces to enhance or protect the amenities of the site and the area in which it is situated through hard and soft landscaping measures. Statements should also explain the function of the landscaping, for instance for sustainable drainage purposes, providing shading or other climate change adaptation purposes, and explain how it will be maintained.
137. If landscaping is reserved at the outline stage, the outline application does not need to provide any specific landscaping information. However, the design and access statement should still explain the principles that will inform any future landscaping scheme for the site.
138. For detailed applications, and outline applications that do not reserve landscaping, the design and access statement should explain the proposed landscaping scheme, explaining the purpose of landscaping private and public spaces and its relationship to the surrounding area. Where possible, a schedule of planting and proposed hard landscaping materials to be used is recommended.

²² See www.securedbydesign.com/professionals/guides_publications.aspx

139. Some development proposals (for example, alterations to an existing building) may include no landscaping element. For such proposals, this section of the design and access statement would simply need to state why landscaping is not relevant to the application.

Appearance

140. Appearance is the aspect of a place or building that determines the visual impression it makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.
141. If appearance is reserved at the outline stage, the outline application does not need to provide any specific information on the issue. In such cases the design and access statement should explain the principles behind the intended appearance and how these will inform the final design of the development.
142. For detailed applications, and outline applications that do not reserve appearance, the design and access statement should explain the appearance of the place or buildings proposed including how this will relate to the appearance and character of the development's surroundings. It should explain how the decisions taken about appearance have considered accessibility. The choice of particular materials and textures will have a significant impact upon a development's accessibility. Judicious use of materials that contrast in tone and colour to define important features such as entrances, circulation routes or seating for example will greatly enhance access for everyone. Similarly early consideration of the location and levels of lighting will be critical to the standard of accessibility ultimately achieved.

Appraising the context

143. Development proposals that are not based on a good understanding of the local physical, economic and social context are often unsympathetic and poorly designed, and can lead to the exclusion of particular communities. An important part of a design and access statement is the explanation of how local context has influenced the design. SI 2010/567 amends the treatment of context: from April 2010, context should be discussed in relation to the scheme as a whole, rather than specifically in relation to the five sub-components of amount, layout, scale, landscaping and appearance.
144. A design and access statement should demonstrate the steps taken to appraise the context of the proposed development. It is important that an applicant should understand the context in which their proposal will sit, and use this understanding to draw up the application. To gain a good understanding of context and to use it appropriately applicants should follow a design process which includes:

- Assessment of the site's immediate and wider context in terms of physical, social and economic characteristics and relevant planning policies. This may include both a desk survey and on-site observations and access audit. The extent of the area to be surveyed will depend on the nature, scale and sensitivity of the development.
- Involvement of both community members and professionals. Depending on the scale, nature and sensitivity of the proposed development, this might include, for example, consultation with local community and access groups and planning, building control, conservation, design and access officers. The statement should indicate how the findings of any consultation have been taken into account for the proposed development and how this has affected the proposal.
- Evaluation of the information collected on the site's immediate and wider context, identifying opportunities and constraints and formulating design and access principles for the development. Evaluation may involve balancing any potentially conflicting issues that have been identified.
- Design of the scheme using the assessment, involvement, and evaluation information collected. Understanding a development's context is vital to producing good design and inclusive access and applicants should avoid working retrospectively, trying to justify a pre-determined design through subsequent site assessment and evaluation.

Use

145. A design and access statement should explain how this understanding of the context has been considered in relation to its proposed use. The use is the use or mix of uses proposed for land and buildings. Use cannot be reserved within an outline application. Design and access statements for both outline and detailed applications should explain the proposed use or uses, their distribution across the site, the appropriateness of the accessibility to and between them, and their relationship to uses surrounding the site.

6.8 What is required: the access component

146. It is important to note that the requirement for the access component of the statement relates only to "access to the development"²³ and therefore does not extend to internal aspects of individual buildings.
147. Statements should explain how access arrangements will ensure that all users will have equal and convenient access to buildings and spaces and the public transport network. The statement should address the need for flexibility of the development and how it may adapt to changing needs.

²³ Section 62(5) of the Town and Country Planning Act 1990 as inserted by section 42(1) of the Planning and Compulsory Purchase Act 2004

148. The design and access statement should also explain the policy adopted in relation to access and how relevant policies in local development documents have been taken into account. The statement should provide information on any consultation undertaken in relation to issues of access and how the outcome of this consultation has informed the development proposals. This should include, for example, a brief explanation of the applicant's policy and approach to access, with particular reference to the inclusion of disabled people, and a description of how the sources of advice on design and accessibility and technical issues will be, or have been followed.
149. Access for the emergency services should also be explained where relevant. Such information may include circulation routes round the site and egress from buildings in the event of emergency evacuation.
150. For outline applications, where access is reserved, the application should still indicate the location of points of access to the site. Statements accompanying such applications should, however, clearly explain the principles which will be used to inform the access arrangements for the final development at all scales from neighbourhood movement patterns where appropriate to the treatment of individual access points to buildings.
151. The level of detail provided in the access component of the statement should be proportionate to the nature and scale of the access that will be required to the site. For proposals which will have no public access and only limited maintenance or operational access, the access component need not be long.

6.9 What should be included in a DAS for listed building consent

152. Design and access statements are also required for listed building consent. They are similar to design and access statements for planning applications, especially in respect of the need for a proportionate approach, although there are some differences in content because of the differing nature of the application.
153. Where a planning application is submitted in parallel with an application for listed building consent, a single, combined statement should address the requirements of both. The combined statement should address the elements required in relation to a planning application in the normal way and the additional requirements in relation to listed building consent (see below).
154. The design and access statement should explain the design principles and concepts that have been applied to the scale, layout and appearance characteristics of a proposal. Scale, layout and appearance are broadly the same as outlined in previous paragraphs. (Information on use, amount and landscaping is not required for listed building consent design and access statements that do not also accompany a planning permission.)

155. In addition to following the broad approach described in sections 6.6 and 6.7 above, a design and access statement relating to listed building consent should include a brief explanation of how the design has taken account of paragraph 3.5 of PPG15 (Planning and the Historic Environment)²⁴, and in particular:
- the historic and special architectural importance of the building
 - the particular physical features of the building that justify its designation as a listed building; and
 - the building's setting.
156. The statement will need to explain the approach to ensuring that the historic and special architectural importance of the listed building is preserved or enhanced. Where an aspect of the design has the potential to affect this adversely, the statement should explain why it is necessary, and what measures have been taken to minimise its impact.
157. The access component is broadly the same as for design and access statements accompanying applications for planning permission, but again with reference to the special considerations set out in paragraph 3.5 of PPG15.
158. The statement should make clear how the approach to access has balanced the duties imposed by the Disability Discrimination Act, where the proposal is subject to those, and the particular historical and architectural significance of the building (as judged by the aspects set out in paragraph 3.5 of PPG15). The statement should detail any specific issues that arise particularly with regard to the fact that the building is listed, the range of options considered and, where inclusive design has not been provided, the statement should explain why. For alterations to existing buildings where the fabric of the structure restricts the ability to meet minimum levels of accessibility, details should be provided of the solutions that will be put in place to minimise the impact on disabled people and ensure that any services provided within the building are made available in other ways.

²⁴ PPG15 is expected to be replaced by a new Heritage PPS. The guidance provided in this section will be superseded at such time as that PPS is published.

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