Development Management
Practice Note

Design and Access Statements

April 2015
Preamble

This Development Management Practice Note is designed to guide planning officers and relevant users through the key requirements of a design and access statement and deals primarily with procedures as well as good practice. It forms part of a series of new practice notes stemming from the Planning Act (Northern Ireland) 2011 [the 2011 Act] and any related subordinate legislation. The emphasis is very much on advice but where explicit legislative requirements must be followed these will be made clear.

Where appropriate this practice note will therefore highlight:

- Relevant legislation;
- Procedural guidance;
- Definitions;
- Best practice examples / relevant case law

This guidance is not intended to replace the need for judgement by planning officers and those making planning applications. Nor is it intended to be a source of definitive legal advice. Reference should be made to the actual legislation referred to in this document and if any discrepancy or conflict exists between the Practice Note and legislation the provisions of the legislation will prevail.
1.0 Introduction

1.1 A core planning principle of the reformed two-tier planning system is to support good design. The planning system therefore plays a significant role in making successful places through its influence on the type, scale, location and design of development, and the use of land. A design and access (D&AS) statement is a report accompanying and supporting a planning application. It provides a framework for applicants to explain how a proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users.

2.0 Legislative Context

2.1 The statutory provisions which set out the requirements for a D&AS are found in the 2011 Act, The Planning (General Development Procedure) Order (Northern Ireland) 2015 (referred to hereafter as the GDPO) and the Planning Listed Building Regulations (Northern Ireland) 2015 (referred to hereafter as the Listed Building Regulations) as summarized below:

The 2011 Act (primary legislation)
Section 40(3) – Form and content of applications
Section 86(2) – Applications for listed building consent

GDPO (subordinate legislation)
Article 3(3) (f) – Applications for planning permission
Article 6- Design and access statements
Article 24(1) (a)-Register of applications

Listed Building Regulations (subordinate legislation)
Regulation 4- Design and access statements

2.2 Sections 40(3) and 86(2) of the 2011 Act requires that certain descriptions of applications for planning permission and all listed building consent applications are to be accompanied by a design and access statement
(D&AS). Details of the applications for planning permission which must be accompanied by a D&AS, and the form and content of such statements, are prescribed in the GDPO. The Listed Building Regulations set out the form and content of a DAS for listed building consent applications.

3.0 When is a D&AS required?

3.1 The following planning applications must be accompanied by a D&AS:
- An application which is a major development; or
- where any part of the development is in a designated area, development consisting of –
  (i) the provision of one or more dwelling houses, or
  (ii) the provision of a building or buildings where the floor space created by the development is $100\text{m}^2$ or more.

4.0 When is a D&AS not required?

4.1 Planning applications that do not require to be accompanied by a D&AS are:
- of the description contained in Section 54 of the 2011 Act, (applications to develop land without compliance with conditions previously attached, unless those conditions specifically relate to a design and access issue);
- for engineering or mining operations;
- a material change in the use of land or buildings, provided that if the new use will necessitate access by an employee or involves the provision of services to the public or section of the public, with or without payment, then the relevant article applies to the application for access only; or
- for development which is waste development.

5.0 Form and content of a design and access statement

5.1 Article 6(3) of the GDPO prescribes that a D&AS must explain the design principles and concepts that have been applied to the development and how issues relating to the access of the development have been dealt with. It must
also demonstrate how the proposed development’s context has influenced the design. The statement must explain the policy or approach adopted regarding access to, from and within the development, and how policies relating to access in the relevant local development plan have been taken into account and explain any specific issues which might affect access to the development for disabled people.

5.2 The D&AS must also describe how features which ensure access to the development for disabled people will be maintained. It must state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation, explain how any specific issues which might affect access to the development have been addressed and explain the design principles and concepts that have been applied to take into account environmental sustainability.

6.0 D&AS to accompany a listed building application

6.1 A D&AS associated with an application for listed building consent must also take account of the design principles and concepts that have been applied to the works and how the design principles and concepts that have been applied to the works take account of—

(i) the special architectural or historic importance of the building;

(ii) the particular physical features of the building that justify its designation as a listed building; and

(iii) the building’s setting.

6.2 It must also set out how issues relating to access to the building have been dealt with and explain the policy adopted as to access, including what alternative means of access have been considered; explain how the policy as to access takes account of—

(i) the special architectural or historical importance of the building;
(ii) the particular physical features of the building that justify its designation as a listed building; and
(iii) the building’s setting.

6.3 The D&AS must also state what, if any, consultation has been undertaken and what account has been taken of the outcome of any such consultation; and explain how any specific issues which might affect access to the building have been addressed.

7.0 **One statement or two?**

7.1 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. The only exception is listed buildings where there are interior works only and an access section is not required. 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.

7.2 The legislative requirement will only apply to planning applications for outline or full planning permission and will not extend to applications in relation to reserved matters.

8.0 **Summary**

8.1 A design and access statement is therefore a document that explains the design thinking behind a planning application and it should show that the applicant has thought carefully about how everyone will be able to use the place(s) they want to build.

8.2 The level of detail in a D&AS should be proportionate to the complexity of the application, but does not necessarily have to be long. For example, for many straightforward planning applications, the D&AS may only need to be a page long.
8.3 Councils should not entertain an application unless it is accompanied by a statement, where this is required by legislation.

8.4 Statements should include a written description and justification of the planning application. Sometimes photos, maps and drawings may be needed to further illustrate the points made. These will be available alongside the application for anyone to see, so they should avoid jargon or overly technical language. It is important that they are written specifically for the application they accompany.

8.5 The document attached entitled ‘Design and Access Statements’ provides further guidance on the submission and requirements of a D&AS. It also provides examples of good practice which may be useful for planning professionals and those wishing to submit a planning application where there is a requirement to include such a statement.
Design and Access Statements

A guide for Northern Ireland
This Practice Note is designed to guide users through requirements of Design & Access Statements and deals primarily with procedures as well as good practice. It forms part of a series of new practice notes stemming from the Planning Act (Northern Ireland) 2011 [referred to hereafter as “the Planning Act”] and any related subordinate legislation. The emphasis is very much on advice but where explicit legislative requirements must be followed these will be made clear.

Where appropriate this practice note will therefore highlight:

- Relevant Legislation;
- Procedural Guidance;
- Definitions;
- Best practice examples / Relevant Case Law

This guidance is not intended to replace the need for judgement by planning officers and those making planning applications. Nor is it intended to be a source of definitive legal advice. Reference should be made to the actual legislation referred to in this document and if any discrepancy or conflict exists between the Practice Note and legislation the provisions of the legislation will prevail.

Practice notes will be made available on the Department’s website for ease of access and can be downloaded as required. Please note that a number of old guidance documents have been cancelled as a result of the publication of the Planning Practice Notes and users should be careful to check this new suite of guidance before relying upon any historic document.
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1.0 Background

1.1 The Department must formulate and co-ordinate policy for securing the orderly and consistent development of land and the planning of that development with the objective of furthering sustainable development and promoting or improving well being.¹

1.2 Fundamental to the achievement of sustainable development and well being is the need for good planning integrated with good design and embracing inclusivity for all members of society.

1.3 Positive place-making, incorporating good design and access, is a key component of sustainable development and can change lives, communities and neighbourhoods for the better through creating better places to live, work and visit and by encouraging economic investment, healthier living and improved safety and well-being.

1.4 Inclusive access applies both at the level of the individual and at a broader community level: the law protects people from unlawful discrimination. Government and public authorities also need to have due regard to the need to promote equality of opportunity and foster good community relations.

1.5 This Departmental guidance document seeks to help applicants write a good Design & Access Statement (D&AS) and assist Departmental officers and local councils in the assessment of the proposals against defined criteria.

1.6 The level of information and detail in a D&AS should be proportionate to the scale, complexity and nature of the application.

¹ Planning Act (Northern Ireland) 2011 Section 1(2)(b)
2.0 What are Design and Access Statements and why are they required?

2.1 A Design and Access Statement [D&AS] is a single document that explains the design thinking behind a planning application. It provides a framework for applicants to explain and to justify how a proposed development is a suitable response to the site and its setting. It explains the principles that will be used to guide the future development of a scheme to achieve good design, positive place-making and universal inclusivity.

2.2 From April 2015, planning legislation requires that certain types of applications are accompanied by a D&AS. The main aim of a Statement is to inform the planning decision making process. When considered holistically, a good D&AS should lead to a general improvement in the speed of decision making, the quality of development and, as a result, an improvement in the built environment, society structures and economic infrastructure.

2.3 Although not always required as part of a planning application the principles of a D&AS can be applied to any scale of proposal and stage of development, either as part of a pre-application, outline or full planning submission. At the early stages of a project the developing D&AS can help provide a clear and secure basis for constructive discussion and negotiations with those having an interest in a proposed development.

2.4 The Department promotes the idea that a D&AS is a 'living document' and as such design and access matters should be considered from the start and throughout the lifetime of a development.

2.5 In practice the design and access elements of a project proposal will be developed in tandem. However from an assessment viewpoint each element will be considered individually, against defined criteria, thus enabling planning staff to thoroughly consider the impacts of each upon the context of a proposed development and how it complies with Local Development Plans (LDPs) and Departmental policies.

2.6 The principles of a D&AS as outlined herein can equally be applied when developing LDPs through:

- the gathering of a robust contextual evidence base that will allow opportunities for analyses and assessments which define the characteristics of an area, thus helping with the development of a vision for the area. This can be tested through options appraisals, environmental impact assessment, consultation and the duty to co-operate, thus creating a stronger and more realistic local policy base giving greater certainty to both future applicants and development management staff.
- ensuring that where the design of proposals furthers sustainable development, is consistent with relevant local development plan policies and Departmental policy and/or guidance, the Department or councils shall generally not refuse permission solely on design grounds, unless there are particular circumstances.

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3.0 When is a Design and Access Statement required?

3.1 A Design and Access Statement is required for:

3.1.1 All major \(^3\) and regionally significant applications, except for:
- applications to develop land without compliance with conditions previously attached (section 54 of the Planning Act (NI) 2011) (unless non-compliance specifically relates to a design or access issue, whereupon a single topic statement is required)
- engineering or mining operations
- a material change of use of land or buildings (however should a new use require changes for provision of public access, applications should be accompanied by an ‘access statement’ only)
- waste development

3.1.2 Applications within a ‘designated area’\(^4\)\(^5\) which involve:
- the provision of one or more dwelling houses; or
- the provision of a building or buildings where the floor space created by the development is 100 square metres or more.

3.1.3 All Listed Building Consent applications

3.2 It should also be noted that:
- the requirement for a D&AS applies equally for applications located in settlements or in the rural area.
- planning policy and supplementary planning guidance will apply to all applications, whether or not there is a requirement for a D&AS.

3.3 The fundamental aim of the planning system is to further sustainable development and improve well being. Departmental policy and guidance, and LDPs underpin and inform this aim. The good practice guidance in this document is intended to give direction to all development proposals, whether or not there is a legislative requirement for a D&AS.

\(^3\) Planning Act (Northern Ireland) 2011 Section 25 & The Planning (Development Management) Regulations (Northern Ireland) 2015 Regulation 2(1)

\(^4\) For the purposes of a D&AS a Designated Area is defined as a World Heritage Site, an Area of Outstanding Natural Beauty, a Conservation Area, or an Area of Townscape or Village Character.

\(^5\) In the World Heritage Site or Areas of Outstanding Natural Beauty, the context and site appraisals will focus primarily on various aspects of the natural environment. Any development proposals in such areas should demonstrate how proposals sensitively respond to such analyses.
4.0 Who can prepare a Design & Access Statement?

4.1. A D&AS should be prepared by a lead consultant, part of whose responsibility is the co-ordination of the content. The statement will potentially contain input from a variety of sources and should demonstrate how the proposal has achieved good design, through collaborative working between planners, architects, urban designers, landscape architects, roads engineers, access consultants, environmentalists, archaeologists, clients, developers, public service providers, communities, individuals and everyone else affected by the development process.

4.2 A D&AS accompanying a Listed Building Consent [LBC] application should be prepared by a suitably qualified consultant, experienced in building conservation. The level of detail provided, should be proportionate to the complexity of the proposal. Where a LBC application relates to a very small or minor change a D&AS can be a short, concise document, prepared by the agent or applicant as appropriate.

4.3 A D&AS accompanying an application for development within designated areas (as defined at footnote to 3.1.2) should ideally be prepared by a consultant who has appropriate expertise and experience.
5.0 How to prepare a Design and Access Statement

5.1 A Design & Access Statement should ‘tell the story’ of how a proposal has taken account of the context and all relevant factors, to help shape and inform the final proposal. The following steps can help applicants and agents demonstrate how proposals have been carefully considered, at each stage of the design process:

The Design Process

1. **Assess:** appraise the context of the site and its surroundings, with consideration of Physical, Historic, Social and Economic characteristics with consideration of Departmental Policies and LDP’s.

2. **Engage:** demonstrate what groups and organisations you have had engagement with (all major applications will require evidence of community involvement) and show how these considerations have informed the proposal.

3. **Evaluate:** consider all the information collated in the assessment and engagement stage and evaluate the opportunities and constraints to help resolve any conflicting issues, stating why decisions have been taken.

4. **Design:** design the scheme informed by the context appraisal, consultation, and decisions made in the evaluation process, with reference to relevant policy, design advice and guidance. Good design proposals should contribute to or enhance a place, to make better spaces for the user and public alike.

5. **Maintain:** ensure the continuing maintenance and stewardship aspects of the development are considered over the lifetime of the scheme.

5.2 Throughout the design process, applicants and agents should evaluate and explain how the proposal:

- Sustains or enhances local character
- Complements and integrates with the surrounding area
- Promotes universal inclusivity by delivering a legible development where it is easy to find your way around
- Promotes a successful relationship between public and private space
- Promotes quality, choice and variety
- Promotes innovative design

5.3 Alternatively, where a proposal fails to satisfy the above requirements, a D&AS should explain why this has not been achieved and, where appropriate, what mitigation measures have been adopted to help minimise any negative impacts.
5.4 A D&AS should contain mainly visual material; diagrams, sketches maps, models, drawings and photographs and can be presented in various formats. It can be on one or two A3 pages, in a small booklet, an A4 or A3 document, a fold-out sheet, a display board or a CD. **The level of information should be proportionate to the scale, nature and complexity of the application.**

5.5 Though design and access are two separate components, much of the preliminary work in terms of the design will inform the access proposal and vice versa. A statement should therefore support a holistic approach to design and access.
6.0 Core Considerations

A Design and Access Statement should demonstrate how the core considerations of **Design, Access and (where applicable) Heritage** have been addressed:

6.1 Design

6.1.1 Good design is based on an understanding of context, to inform a considered and sensitive response. Every place is unique and the context can be local to the site, to the block, to the area, to the wider settlement or landscape, or a combination of all of these. Design is not simply about aesthetic considerations but much more about how a development works in use and how it relates to its context.

6.1.2 Aesthetically acceptable design can be inappropriate in its context if it does not contribute to the quality of a place, e.g. by being grossly out of scale or character, by being an inappropriate use, or by being poorly located. Where listed buildings or *heritage assets* form part of the context, then special sensitivity is required. In other circumstances the context may be so degraded as to warrant a completely radical response in an attempt to kick start regeneration. Even then, such an approach needs to be justified and understood by a wider audience. In almost all instances there will be aspects of place, whether historical, cultural, social, topographical, etc. that provide a reference from which development proposals can evolve.

6.1.3 To demonstrate the steps taken to appraise and evaluate the immediate and wider context of the proposed development, a D&AS should include:

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**Diagram 2 (Right)**

*Considering Character Appraisal*

Ref: [http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf](http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf)
B. A site appraisal

covering assessment and analysis of built and natural site features / assets / liabilities / contours / orientation / sun-path / views [out/in] / linkages [physical/visual] / external influences [e.g. noise, etc.]

Diagram 3 (Above)

Site Appraisal
Ref: http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf
C. Design Principles

Explain the design principles that have been applied to the proposal in terms of the location, use, amount, layout, height, scale, massing, materials, landscaping, appearance, and sustainability of the development. Include for each item listed above justification and comment as to how this relates to and complements the wider area as follows:

i. Location:
Where the development is and the boundary of the site.

ii. Use:
What buildings and spaces will be used for and how this complements surrounding land uses.

iii. Amount:
How much development is proposed.
(For residential development, this means the number of units for residential use and for all other development, the proposed floor space for each proposed use. The Statement should explain and justify the amount of development proposed for each use, how this will be distributed across the site and how the proposal relates to the site’s surroundings. In the case of residential developments an explanation of the proposed mix of dwelling type and tenure should be included. Densities should be calculated [bedspaces/hectare for residential, plot ratio for commercial]

iv. Layout:
How routes and open spaces are provided, placed and orientated in relation to each other and buildings and spaces surrounding the development. The use of concept and illustrative diagrams will assist in explaining this. D&ASs for outline and full applications should demonstrate how crime prevention measures have been considered in the design. How the buildings and private/public spaces will be arranged on the site, the treatment of them, and the relationships between them and the buildings and spaces surrounding the site.

v. Height
How tall the structures are [measured in metres above an OSBM⁶] and their effect on the skyline.
(Upper and lower limits for outline schemes)

vi. Scale
What the proportion of the structures and spaces would be.

vii. Massing
What the three dimensional form of the structures and spaces would be.

viii. Materials
What the structures and spaces are made of.
ix. **Landscaping**
How the treatment of private and public spaces in the scheme is aimed at protecting and/or enhancing the amenities of the site and the character of the area in which it is situated through hard and soft landscaping measures. Statements should also explain briefly how landscaping will be maintained.

x. **Appearance**
How all aspects of the development will look, which ones determine the holistic visual impression it makes, including its architectural language, materials, decoration, lighting, colour and texture.

xi. **Sustainability**
Where and how considerations of the economic, social and environmental aspects of sustainability have influenced the design. Inclusive design is a key component of sustainable development but should be covered in the part of the statement dealing with access. It is a requirement that all developments should demonstrate how they have addressed the principles of sustainability, in order to obtain planning permission.

Diagram 4 (Above)
Example of a Concept Diagram
Ref: [http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf](http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf)

OSBM - Ordnance Survey Bench Mark
Achieving Privacy at higher density

- single storey courtyard houses on the boundary
- predominantly inward looking
- orientated to achieve sunny courtyards

Focal point group

- 2.5 storey town houses
- right hand unit terminates view from site entrance
- scale and proportions designed to be seen from a distance
- building helps to enclose the focal point ‘square’
- informal shared surface (dashed line indicates turning space)
- trees help to define and soften the space

Relating new with the historic building

- the existing mid Victorian villa has been rehabilitated
- new development to the side and rear should retain the spaces to front, rear and side of this freestanding villa
- the new building is subservient to the existing and retains its proportions and freestanding character, whilst being contemporary in design
- the derelict outhouse has been rehabilitated

Ref: http://www.hertslnk.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf
6.2 Access

6.2.1 Access means much more than simply the 'entrance' or 'way in'. It also takes account of the physical connections of a development to its surroundings, considering how people will use the space around the buildings and how they travel to it by vehicle, by public transport, by bicycle or on foot. It is also concerned with the role development has in consolidating and improving the primary network of routes and connections in our settlements and across the Region. The RDS seeks to reduce reliance on the private car and this aim should also be reflected in a D&AS.

Photo 1: Improving city connectivity across the River Foyle
(Above): New pedestrian Peace Bridge, Derry/ Londonderry
6.2.2 A statement in relation to Access considerations should therefore:

- **Explain the concept and detail behind access strategies** for the development. At a site or building level, this should include information on how universal inclusivity is addressed, especially for those with disability. Additionally, at a wider block, area or settlement level considerations of connectivity and permeability are relevant. Access consultants or bodies such as Disability Action may have beneficial input to such strategies.

[Note: Whilst the location and detail of external routes and entrance points is a planning concern, the practicalities of access within buildings, apart from listed buildings, are mainly addressed separately, by others, under the Building Regulations.]

Diagram 6 (Above)

Hierarchy of Streets & Places
Ref: [http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf](http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/Design_Feb_11.pdf)
Detail how issues relating to access to the development have been dealt with, by outlining how the following aspects of access have been addressed:

A. **Infrastructure and transport linkages**
- Why the access points and routes have been chosen
- How the site responds to footpath, cycleway, and road layout and public transport provision in the immediate and wider area
- How users will be able to gain access to the development from the existing public and private transport networks
- How access is provided for emergency vehicles, maintenance, waste management and deliveries.

B. **Inclusive Access**
- How everyone can get to and move through the place on equal terms regardless of age, disability, ethnicity, religion or social grouping.
- How level changes influence access
- If there are no access issues then the statement needs to explain this.

C. **Consultation**
- Detail any consultations, including those with the community and potential users, undertaken in relation to D&A issues for the development, the issues raised, and how they have been addressed.

D. **Policy Context**
- Indicate how relevant regional and local development plan policies and supplementary planning guidance have been taken into account.
Diagram 7 (Above)
Sample pages of an outline planning application for a large city centre redevelopment scheme. [148 pages total]
Sirocco Quays Development, Belfast
Courtesy of the Carvill Group
6.3 Heritage

**Listed Buildings**

6.3.1 Planning legislation requires that all LBC applications are accompanied by a D&AS\(^7\). In addition to explaining the approach to design and access, statements should also explain the potential impact on the ‘heritage significance’ of a listed building, describing why the change is required and what measures have been taken to sensitively manage this change.

6.3.2 The content of a D&AS to accompany a LBC application are similar to those for general development applications. However a statement as part of a LBC application must, in addition, explain how the design principles and concepts, and issues relating to access, have taken account of the special interest of the listed building.

6.3.3 As an initial step in understanding the potential impact that a proposed change will have on the heritage significance of a listed building there should be an assessment of its special architectural or historic importance. This account of the listed building, which should be included in the D&AS, will be referred to as a ‘statement of significance’ and should include reference to the statutory listing criteria as set out in Revised Annex C of PPS6 (March 2011) and as outlined below:

- **Architectural Interest**: understood to encompass a broad spectrum which ranges from style, character and ornamentation to internal plan form and functionality. Also important are examples of particular building types and techniques used in their construction.

- **Historical Interest**: understood to encompass a broad spectrum which ranges from age and rarity, through the amount of historic material left in a building, to its importance as a historic structure, and to the stories, historical events and people associated with the building. Aspects of social, economic and cultural history revealed by the building may also be considered important.

- **Group Value**: any respect in which its exterior contributes to the architectural or historic interest of any group of buildings of which it forms a part

- **Features**: the desirability of preserving, on the ground of its architectural or historic interest, any feature of the building which consists of a man-made object or structure fixed to the building or which forms a part of the land and which is comprised within the curtilage of the building.

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\(^7\) Planning Act (Northern Ireland) 2011 Section 86(2) and The Planning Listed Building Regulations (Northern Ireland) 2015 Regulation 4
6.3.4 A proportionate approach should be applied to the level of detail required for a D&AS accompanying a LBC application, and should be appropriate to the importance of the building and scale, nature and complexity of the proposal. Illustrations, drawings, specifications, and photographs may supplement statements to help explain the proposed changes and illustrate how they have been sensitively managed to conserve the special interest of the building. These should provide sufficient detail to allow a full assessment.

6.3.5 A D&AS should satisfy the planning legislation\(^8\). A Statement which includes the following can assist an applicant meet the legislative requirements. This is not an exhaustive list of information which may accompany a D&AS, but is a guide to identify relevant content. (Refer to Annex 2 for further information in relation to listed building considerations)

A. Statement of Significance

Describes the significance of the listed building or any protected structure within the curtilage of a listed building, affected by the proposal and includes any contribution made by their setting. The level of detail should be proportionate to the importance of the listed building and should be sufficient to understand the potential impact of the proposal on its significance.

B. Concept

Explains how the design principles and concepts have taken account of the essential character of the listed building, and its setting. For an application which impacts on the setting of the listed building, a Statement should also include a site appraisal.

C. Impact Assessment

(i) Design

Describe how the proposed changes have taken account of the heritage significance of the listed building, relevant policies and the internationally agreed conservation principles:

- **Minimum Intervention**: Conservation is based upon a respect for the existing fabric and should involve the least possible physical intervention.
- **Maximum Retention of Fabric**: Conservation should involve the greatest respect for, and involve the least possible loss of material of cultural heritage value.
- **Reversibility**: The use of reversible processes is always to be preferred to allow the widest options for future development or the correction of unforeseen problems, or where the integrity of the resource could be affected.
- **Legibility**: Replacements of missing parts should be distinguishable from the original so that restoration does not falsify the artistic or historic evidence.
- **Sustainability**: the point being to make sure that current use of the heritage, which is desirable, does not destroy the chances of handing it down to future generations.

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\(^8\) The Planning (Listed Building) Regulations (Northern Ireland) 2015 Regulation 4
Design impact assessments should also:

- Explain how the works proposed will impact upon the ‘significance’ of the listed building.
- Assess the scale and harm that would be caused to the significance of the listed building.
- Provide reasons as to why this change is required and what measures have been employed to eliminate or minimise the impact on the significance of the building.
- Identify any potential heritage benefits that will enhance or better reveal the significance.

(i) Access

- Describe how the access proposal has balanced the requirements of the Disability Discrimination Act, Building Control and the ‘heritage significance’ of the building.
- Identify how the access strategy has been sensitively managed to take account of the special architectural interest historic fabric of the listed building.

(Listed building consent proposals, which do not involve changes related to accessibility, will not require an access statement.)

D. Consultation

State what, if any, consultation has been undertaken with relevant organisations i.e. NIEA Historic Buildings Unit, Building Control, NIHE, Disability Action or others, and what account has been taken of the outcome of any such consultation.

E. Management Strategy

Where universal access has not been provided, i.e. because of constraints, explain the measures taken to minimise the impact and manage alternative access arrangements.

Alteration v Accessibility

6.3.6 While the principle of inclusive design is a consideration for all planning applications, universal access within a building is generally not a material ‘planning’ consideration.

For LBC applications however, proposed changes into or within a listed building, will be a key consideration, especially where a balance has to be made between the potentially conflicting requirements of retention of historic fabric and alterations to provide universal access.

Technical Booklet R, Building Regulations NI, states ‘..where work is to be carried out to a protected building to comply with Part R or any other Part of the Building Regulations, special consideration may be given to the extent of such work for compliance, where it would unacceptably alter the character or appearance of the building.’

Collaborative working between the Department, Building Control, councils, DDA, and applicants, can help to find reasonable and proportionate solutions to universal access into and within listed buildings. Imaginative proposals which complement the special character of historic buildings and improve access for everyone are actively encouraged.
Heritage Assets

6.3.7 The SPPS\textsuperscript{10} Part 1 requires that, ‘Particular weight should be given to the impact of the development on existing buildings, especially listed buildings and scheduled monuments, and on the character of areas recognised for their landscape or townscape value, such as Areas of Outstanding Natural Beauty, Conservation Areas, Areas of Townscape Character and Areas of Village Character.’

6.3.8 While a formal D&AS is not generally required for a planning application involving heritage assets, it is good practice to include a commentary which addresses the heritage considerations identified in this Section, to assist consultees and decision makers understand the impact of the proposed change, on the importance of the asset and its setting. The level of detail and extent of information provided in a D&AS should be proportionate to the importance of the heritage asset and the scale, nature and complexity of the application.

\textsuperscript{9} Building Regulations (Northern Ireland) 2012 Guidance, Technical Booklet R, Access to and use of Buildings, P5

\textsuperscript{10} At this stage the SPPS is subject to clearance by the Executive Committee.
7.0 Frequently Asked Questions

Q: Are design and access statements two separate documents?
A: No, whilst the legislation\(^\text{11}\) separates the requirement for a statement on design principles and concepts from that for access issues it is normal to expect that design and access considerations will be addressed in the one document, but as separate entities.

Q: Is a D&AS needed for pre-application discussions?
A: Good practice indicates that appraisal of context and consideration of aspects of design and access should be undertaken at the start of every development project. A draft of the statement, at least covering background information and site appraisal, should be available to help inform discussions and considerations at pre-application stage and community consultation stage.

Q: Can a D&AS be used as a substitute for drawings and other materials normally submitted with a planning application?
A: No. Information as required by Art3 of the GDPO will be required to be submitted as part of a planning application. This is a separate requirement from the need to submit a D&AS for certain types of development.

Q: What design and access details need to be submitted with an Outline Application?
A: A D&AS for an outline planning application is required to detail any decisions taken to date but should also explain the design and access principles which will define future development. It should contain sufficient information to describe the fundamentals of the scheme including uses, the amounts of development for each use, and access arrangements. Where matters are reserved, then only indicative layouts of buildings, routes and open spaces, heights, scale and massing [upper and lower limits] are required. The principles behind the landscaping should be explained. Thus, in addition to the background studies and site analysis, a D&AS should explain why the parameters in respect of the above information have been chosen. Especially in sizeable developments and large regeneration/redevelopment schemes it should also set out the design and access principles to be followed as the design progresses.

Q: Can details of Reserved Matters be submitted with an Outline Application?
A: An applicant can choose to submit details of any of the reserved matters as part of an outline application. Unless the applicant has indicated that those details are submitted 'for illustrated purposes only’ the Department or council must treat them as part of the development in respect of which the application is being made; the planning authority cannot reserve that matter by condition for subsequent approval. The Department or council will need to consider whether, in the circumstances of the case, some or all of the reserved matters that do not form part of the outline application need to be submitted at the outline stage.

\(^{11}\) The Planning Act (Northern Ireland) 2011 Section 40(3) and Section 86(2)
Q: Can a local planning authority request further information in relation to reserved matters?
A: A progress statement should accompany a submission for reserved matters updating what changes have occurred since outline stage. If it is considered necessary to ensure that the reserved matters accord with the indicative information submitted as part of an application and/or any element of the D&AS, including the amount of development, this should be made clear by condition at outline approval stage.

Q: Are separate D&ASs required for a planning application submitted in parallel with an application for listed building consent?
A: No. A single combined statement should address the requirements for both. For listed building consent the D&AS will be required to address issues of internal alteration and access where these potentially affect the fabric of the building.

Q: How does a D&AS for a listed building differ from a standard D&AS?
A: The design and access considerations are the same but in addition a statement for a listed building must contain commentary on heritage considerations [ref.para. 6.3]

Q: How should a D&AS accompanying a Listed Building Consent application be structured?
A: A D&AS accompanying a LBC application can be structured either as two separate design and access entities incorporating heritage considerations, or as three separate considerations of design, access and heritage, as appropriate to the proposals.

Q: What information is required if an application is subject to Environmental Impact Assessment?
A: A D&AS as described herein will be required for all projects as noted. For projects requiring an Environmental Impact Assessment, a separate Environmental Statement [and non-technical summary] must be provided in accordance with the relevant EIA Regulation requirements.

Q: How is an application treated if a D&AS, if required, is not submitted?
A: The legislation aims to ‘front load’ the system, by ensuring all information is submitted up front, and requests that the applicant has demonstrated how they have reached their design conclusion. Anyone making a planning application needing a D&AS should understand that without an appropriate statement their application will be made invalid and returned.

Q: Is a D&AS a material consideration?
A: Yes. A D&AS should show that development will incorporate inclusive design principles from the outset and support sustainable development.
### 8.0 Glossary

<table>
<thead>
<tr>
<th>Terminology</th>
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<tr>
<td><strong>Inclusive Access</strong></td>
<td>Access for everyone – all ethnicities, men and women, young and old, rich and poor, religious and non-religious, people with eyesight problems, those with hearing difficulties, those with mental impairment, those with less than perfect mobility, parents with buggies, etc. Inclusive design puts people at the heart of the design process so that everyone can use buildings and spaces, and participate in everyday activities fully, equally, confidently, independently, safely and with dignity.</td>
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| **Sustainable Development**  | Is that which:—  
|                              | • Meets the needs of the present without compromising the ability of future generations to meet their own needs.  
|                              | • Achieves living within environmental limits  
|                              | • Ensures a strong, healthy, just and equal society  
|                              | • Achieves a sustainable economy  
|                              | • Uses sound science responsibly  
|                              | • Promotes opportunity and innovation  
|                              | • Promotes good governance *(Initial bullet is Resolution 42/187 of United Nations Assembly, the others are from the NI Executive's Sustainable Development Strategy)* |
| **Environmental Sustainability** | Working within the capacity of the natural environment to minimise resource, energy and water usage, C02 emissions, waste, pollution and excess noise whilst promoting biodiversity. |
| **Connectivity**             | How the space and routes within a development, considered from both the pedestrian and transport perspectives, connect with existing and proposed spaces and routes in the wider area. The emphasis is on achieving routes that aid ease of movement and which are logical and necessary i.e. those that are likely to be used and which aid the legibility of a place. |
| **Permeability**             | How the routes and spaces into and through a development promote universal inclusivity |
| **Designated Areas**         | For the purposes of a D&AS these are World Heritage Sites, Areas of Outstanding Natural Beauty, Conservation Areas, Areas of Townscape Character, and Areas of Village Character. |
| **Listed Buildings**         | A building included in a list compiled under Section 80(7) of The Planning (NI) Act 2011, and, |
(a) any object or structure within the curtilage of the building and fixed to the building;
(b) any object or structure within the curtilage of the building which, although not fixed to
the building, forms part of the land and has done so since before 1st October 1973.’

| Heritage Asset | Heritage Assets are buildings and landscapes, buried remains and historic areas of
architectural or historic interest. Some of these assets have statutory protection as listed
buildings or scheduled monuments. Others are included in designated conservation
areas, historic parks and gardens, World Heritage Sites, National Parks and Areas of
Outstanding Natural Beauty. |
| Designated Heritage Asset | A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site,
Registered Park or Garden, Registered Battlefield, Conservation Area, or Area of
Townscape or Village Character designated as such under the relevant legislation. |
| Heritage Significance | The value of a heritage asset to this and future generations because of its heritage
interest. That interest may be architectural or historic. DOE’s publication on the Listing
Criteria (March 2011) explains how this can be subdivided into 20 more detailed criteria
to aid assessment. Many listed buildings will have associated reports which explain their
significance relative to these criteria. For more information visit the Northern Ireland
Buildings database at www.environmentni/niea.gov.uk. It should be noted that
significance derives not only from a heritage asset's physical presence, but also from its
group value and setting |
| Vernacular Buildings | Vernacular buildings reflect the local ‘folk tradition’ and are typical of a common type of
building in a particular locality, generally pre 1925. For more detail refer to ‘A Sense of
Loss – The Survival of Rural Traditional Buildings in Northern Ireland’, published by
DOE, March 1998. |
| Historic Building of Local Importance | A historic building of local importance is a building, structure or feature, whilst not
statutorily listed, that has been identified by the council as an important part of their
heritage, due to its local architectural or historic significance. |
## 9.0 Primary References

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<sup>12</sup> N.B. After 01 April 2015 where a council adopts its plan strategy existing operational policies [i.e. excluding the SPPS] shall cease to have effect in the district of that council and shall not be material considerations in the consideration of any planning application to be determined after the expiry of the transitional period (whether received before or after that date).

<sup>13</sup> At this stage the SPPS is subject to clearance by the Executive Committee.
### Title

 | Building on Tradition: A Guide to Sustainable Development in the Countryside  
 | Creating Places: Achieving Quality in Residential Developments |
|---|---|
| Other Legislation | Northern Ireland Act 1998. Section 75  
 | Disability Discrimination Act 1995 [DDA]  
 | Disability Discrimination (NI) Order 2006 |
| British Standards | BS8300:2001 Design of buildings and their approaches to meet the needs of disabled people – Code of Practice. British Standards Institution  
 | BS7913:2013 Principles of the Conservation of Historic Buildings |
10.0 Information Sources

Other Sources

- CABE. Design and access statements- How to write, read and use them
- Scottish Executive: Planning and Building Standards Advice Note: PAN 68: design statements
  http://www.scotland.gov.uk/Publications/2003/08/18013/25389
- Scottish Executive: Planning and Building Standards Advice Note: PAN 78: inclusive design
  http://www.scotland.gov.uk/Publications/2006/03/07164427/0
- Welsh Government: Technical Advice Note 12: Design
- Building futures - Hertfordshire
  http://www.hertsdirect.org/statweb/interactivetoolkit/

14 Other UK guidance is compiled to support the relevant legislation of the English, Scottish or Welsh governments and should not be read as applying in Northern Ireland.
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Annexes

Planning officers, and other interested parties, are expected to appraise the content of D&ASs. At Annexes 1 and 2 are checklists of questions that can help in reaching reasoned and balanced judgements regarding design considerations for general development proposals and for those involving listed buildings.
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Annex 1 General Considerations

DESIGN CONSIDERATIONS IN PLANNING APPLICATIONS

This document is intended as an aide memoire to considerations to be applied, and questions posed, in relation to the design assessment of planning applications. Whilst much of the information below may read as a 'tick sheet', it is not meant to be so, and should not be treated as such. It is apposite to remember that if an application is approved and constructed we all have to confront the built reality.

Ask the questions - Will it be a place or building that is pleasant, enjoyable, sustainable and healthy? – does it look good? – does it function well? –does it add to a sense of well being?

It is unlikely that all the considerations listed below can be answered positively and it will therefore be necessary to:

a) make an assessment of those characteristics that should apply and which take precedence over others in the particular situation, and,

b) decide what an acceptable overall balance may be.

The questions posed below help address the component ‘10 Qualities’, and their sub-themes, necessary for the delivery of good placemaking and sustainable development as set out in Departmental guidance document 'Living Places: An Urban Stewardship and Design Guide for Northern Ireland'. The 10 qualities are Visionary i Collaborative i Contextual i Responsible i Accessible i Hospitable i Vibrant and Diverse i Crafted i Viable i Enduring

1.00 INTRODUCTION

.01 Design is not restricted simply to matters of style or the aesthetic appearance of a scheme, important though the latter may be, but rather encompasses all those other elements contributing to making a scheme work successfully in use over its lifetime.

.02 An understanding of how a place has evolved to be as it is currently is an important starting point from which to determine how best it might change and develop in future. From a design perspective this implies an understanding of the factors, based largely on geography and history, which contribute to the present built character of a place. All places are unique. The aim should be to preserve and/or enhance this uniqueness.

.03 Planning officers need firstly to have a good knowledge and understanding of those areas they are responsible for. This cannot be gained solely from sitting at a desk and there is a need to get out and familiarise oneself 'on the ground' with the places in question.
.04 Similarly an applicant, or rather their designer, should have an understanding of the context into which their proposal sits, and this should be evident in the application. It is however the planning officer who should normally have the wider overview of a particular place – both now and for the future.

.05 Evidence of this sequence of events [i.e. an analysis of context subsequently informing design proposals] should be looked for in all applications; though the extent of evidence necessary will vary depending on the size of the application e.g. it may be adequately deduced from drawings submitted that the size and style of an extension has been derived from the style of the main building, whereas in a larger application covering a substantial area, or those in prominent locations, greater background detail should be sought i.e. ideally through a design statement.

.06 Below are listed some of the factors to be considered, and questions to be posed, from a design perspective. It can be seen that answers in one section will often apply in others. It should again be emphasised that the detail attaching to these questions should be used proportionately to the scale, significance, and particular emphasis of an application.

2.00 URBAN/RURAL DESIGN APPRAISAL

.01 In general it is preferable that new development respects and builds upon what is already there. It should be recognised that in most instances what exists is likely to be the result of development, in varying styles, over a long period of time. Building styles and technology are continually changing and advancing, and with skilful handling can be reconciled with what has gone before.

.02 Conversely in degraded, fragmented built environments a unique response to new development may be the appropriate catalyst to spark regeneration. All development should, however, knit together with the wider urban fabric.

.03 When assessing proposed development we need to consider how the proposal responds to the existing layout of buildings, streets and places – are there comfortable inter-relationships? – do streets connect, buildings relate and spaces complement?

"It is possible to combine sensitivity and due deference to the surroundings with a confident expression of individuality and a modern identity. Unusual, distinctive, modern buildings [provided they are of sufficiently high design quality] can sit happily in the context of a historic street.'

.04 Even greenfield / rural sites, which may have no infrastructure of their own, will generally have a relationship to a wider settlement pattern or landform, whose particular characteristics will be a relevant consideration.

.05 Considerations and Questions to Ask
• **LANDSCAPE/TOWNSCAPE**
  - consider the 3-D topographical form of the site and how it has influenced the development
  - is the new development integrated into the wider landscape / townscape setting?
  - are the new and existing integrated at their boundaries to maintain a continuity of urban form or landscape?
  - are natural site features conserved and/or enhanced?
  - is the local ecology conserved and/or enhanced?

• **LAYOUT**
  - what are the patterns, arrangement and orientation of the new blocks and elements?
    - to each other?
    - to adjacent development?
    - does this respect the ‘grain’ of the street and the area?
  - is there a definite building line?
    - what are the effects of projections/setbacks?
  - does the scheme reinforce and define the street?
  - what are the building/ façade orientations?
    - how will this affect the interiors? [e.g. well/poorly lit?]
    - how will this affect the adjacent streets and spaces? [e.g. overlooking/supervision]
  - how has the layout informed/influenced the external spaces? [e.g. have the external spaces been well planned or are they leftover spaces?]

• **CHARACTER, CONTINUITY + ENCLOSURE**
  - how well is the scheme integrated into the surrounding context? Is the continuity, or variety, of the built form respected?
  - what are the locally distinctive patterns of development, landscape and culture?
  - does the scheme respond to these locally distinctive patterns of development, landscape and culture?
  - are they reinforced, reinterpreted or disrupted?
  - does the scheme create/enhance a ‘sense of place’?
    - do the activities/uses fit?
    - narrow plot widths
      - enable more active frontages
      - increase sense of enclosure
      - allow higher densities
    - is the scale, massing and height compatible?
      - consider in relation to existing buildings, typography, vistas, views, landmarks, patterns of light and shade
  - consider the skyline, building frontage line, plot arrangement, etc
  - building traditions and materials - scale, texture, colour
    - do the proposed materials match or exceed the quality of the existing?
      - "traditional materials used in a new way can relate a building to its surroundings.'
- "use of sympathetic materials can provide a visual link between old and new without the new copying the details of the old or pretending to be old.'

**PUBLIC REALM** [the aim is to achieve attractive outdoor areas that are used and maintained, with no leftover or redundant space]
- public and private space in the proposal
  - how much?
  - does it integrate with adjacent spaces?
- consider the use and design of space within the proposal
  - has adequate, usable private and public space been incorporated into the design?
  - ensure any public space is integral to the layout rather than being an afterthought or parcel(s) of land that has no development potential
  - do public spaces function to meet the needs of all potential users? (young / elderly / disabled / pedestrians / cyclists, etc)

**PERMEABILITY AND CONNECTIVITY** [ease of movement]
- consider all available forms of travel – walking, cycling, train, car, bus, taxi, rapid transport, etc.
- do the spaces and routes connect with each other and with adjoining routes?
- are the spaces and routes in and around the proposal logical and necessary? [i.e. likely to be used]
- patterns of travel
  - is there a proposed network of routes within (and possibly beyond) the site that supports and builds on existing transport routes?
  - are there existing nodes or stops to connect to?
  - do the routes take the most logical shape and form [desire lines]?
  - do some forms of transport over-dominate and divide the area?
  - if so, can this be mitigated?

**LEGIBILITY** [ease of understanding]
- does the development have a clear image or identity?
- is it easy to understand?
  - do the design, function, layout and location of buildings reinforce and enhance the area? – consider corner buildings, etc.
  - do any views/vistas that are created enhance existing ones and assist movement through the area?
  - are entrances and exits accessible and easy to locate?

**ADAPTABILITY** [ease with which a place can change]
- how flexible is the layout and design – does the design and layout allow for extension or changes within the lifetime of the development? e.g. conversion to other uses [consider floor to floor heights as well as plan form]
- think about the future; can the buildings be easily extended?
- how easily might the development respond to social, technological and economic changes? – think about reasonably foreseeable future changes

- **DIVERSITY AND CHOICE** [a place of variety – consider the building, the street, the area]
  - is there a good and appropriate mix of uses / buildings / densities / heights / spaces?
    - is the development mix compatible with the area?
    - are the mix of uses within the development compatible?
    - will the mix of uses generate street activity in the area?
    - is this activity confined only to certain times of the day, or week? – is this desirable?
    - whilst mixed uses, which generate activity throughout the day, are desirable bear in mind that single uses may also be appropriate; and not every place can be, nor should be, busy and vibrant all of the time

- **IMPACTS**
  - overlooking / loss of privacy – is there an unacceptable degree of overlooking and loss of privacy in adjoining / adjacent properties? [critical for residential, but consider the different uses]
  - overshadowing – if it is likely to be critical request existing and proposed morning, mid-day, and evening shadow studies for spring and autumn equinoxes, and summer and winter solstices
  - noise – refer also to environmental reports – are the uses and/or equipment [e.g. generators, air conditioning units, etc] likely to generate excessive noise?
  - smells, etc.

- **SUSTAINABILITY** [not all the factors listed below are relevant from a design perspective, which focuses mainly on the strand of environmental considerations i.e. minimisation of energy consumption, water usage and CO\(^2\) emissions, flooding, etc.]
  - **Social** – consideration of the well being of individuals and society:-
    - is there a consolidation and balance of good community structures and/or a beneficial improvement in those which are poor or malfunctioning?
    - is there universal social inclusion? neutral/shared space? access for all – able / disabled / all genders / all communities / etc.?
    - is there an active public realm which encourages and facilitates social interaction?
    - has there been meaningful engagement with all stakeholders? [including the community]
    - has heritage and/or culture been conserved and/or enhanced?
    - have crime and other risks been minimised?
    - has public health been improved through the design of the buildings, the public realm, and its linkages to existing infrastructure?
- Economic

- has economic opportunity and employment been maintained or enhanced?
- have whole life costs been minimised?
- is there improved access to services – public and private?
- does the design of buildings and the public realm deliver health benefits thereby reducing healthcare costs?

- Environmental - working within the capacity of the natural environment. Passive measures such as siting, orientation and building configuration need to be considered from the early design stages and are to be preferred to applied technology such as photovoltaics etc. which often have long pay back periods. Technology is progressing all the time however and these factors should be kept under review. Ideally there should be a commitment [not just an aspiration] to achieve high levels of recognised sustainability targets e.g. BREEAM, EcoHomes, Lifetime Homes, etc. rather than simply meeting the statutory measures of building regulations etc. which are minimum requirements.

- has energy use been minimised [by the application of appropriate technologies]?  
  - through orientation?
  - through maximisation of daylighting?
  - with natural ventilation?
  - with passive solar design?
  - by the use of sustainable, and sustainably sourced, materials?
  - through the use of combined heat and power [CHP], ground/air source heat pumps, etc?
  - by incorporation of photovoltaics and/or solar water heating?

- has the minimisation of CO2 emissions been considered?
- has embodied energy been considered?
- has water usage been minimised?
  - with green/grey roofs to control water run-off?
  - by the incorporation of SuDS?
  - with greywater recycling?
- is the development in a floodplain?
- is there reuse of brownfield land?
- has there been remediation of contamination?
- is biodiversity considered?
  - with planting, wildlife corridors, green/grey roofs [natural in preference to sedum which is poor for biodiversity]

- is there evidence of the minimisation and management of waste and pollution? [including adequate provision for waste recycling]
- are there adequate measures to minimise noise pollution?
- are public transport, cycling and walking promoted? [changing facilities for cyclists included in buildings? + secure storage for bikes?]
3.00 ARCHITECTURAL DESIGN + DEVELOPMENT FORM

.01 Our best places have generally been developing and adapting over long periods of time. Rarely are they constructed entirely in a single architectural style and often buildings of many periods are found grouped together. With contemporary design there is sometimes an element of 'the shock of the new' but with the benefit of hindsight it can be appreciated how, by respecting certain rules, structures of different periods can co-exist harmoniously. Buildings in a 'contemporary' or 'modern' idiom should not be resisted or discouraged just because of their architectural language, or because they 'look different'.

"in a diverse context a contemporary building may be less visually intrusive than one making a failed attempt to follow historic precedents."

"traditional materials used in a new way can relate a building to its surroundings."

"use of sympathetic materials can provide a visual link between old and new without the new copying the details of the old or pretending to be old."

• DENSITY + MIX
  - establish the number and type of units
  - establish the type[s] of use [in large schemes it is desirable to include community and/or public uses]
  - what is the plot ratio, number of dwellings per hectare, number of bedspaces per hectare, etc?
  - how do these compare with the surrounding area and with guideline standards?
  - are mid to high densities balanced by adequate amenity space – private / semi-public / public?

• SCALE – HEIGHT
  - how is the height related to general building height in the area? - is it too high or too low?
  - how does the height compare to local landmarks, strategic views, etc? - does it block or disrupt them?
  - what is the effect on the skyline? - is it too dominant or disruptive?
  - what is the ratio of building height to street width? - is the street or space too oppressive and restricted, or is it too loose and unstructured?

• SCALE – MASSING + SPATIAL FORM
  - consider the proposal in comparison to existing buildings, typography, vistas, views, landmarks, patterns of light and shade. What are of importance are the fundamental mass, scale and height of the proposal in relation to what exists; not necessarily the architectural style and detail of the proposal.
  - is either the continuity or variety in the area respected?
  - consider the skyline, building frontage line, plot arrangement, etc
  - *in a diverse context a contemporary building may be less visually intrusive than one making a failed attempt to follow historic precedents."
  - consider the combined effects of the disposition, volume and shape[s] of the building or group[s] of buildings in
relation to its parts and to adjacent buildings and spaces – in elevation? – and in three dimensions?
- what is the relationship to adjoining/adjacent development? – in elevation? – in 3-D?
- what is the effect on the skyline?
- what are the shapes of the roofs?
- is the building a potential landmark or simply part of the overall fabric? - if a landmark, consider in a much wider context – does it mark something significant? – or just itself?

• ARCHITECTURAL LANGUAGE – STYLE
- *‘successful architecture can be produced by following historic precedents closely, by adapting them or by contrasting with them.’*
- even when using the latest technologies and building types it is generally desirable to reconcile these with local practices
- does the proposed development reflect local architectural distinctiveness?
  - local typologies, boundary treatments, building lines, roof slopes, window proportions and types, etc.
  - appropriate scale of detail?
  - is the architectural style which has been adopted suited to the location?
- does the proposal have a predominantly horizontal or vertical emphasis?
  - is this compatible with that of its neighbours and the area in general?
- does the style suit the massing etc? e.g. a large building in a residential style may appear incongruous
- is there integrity of style? e.g. have inappropriate fussy details been used with a modernist style, which relies largely on the inter-relationship of solid to void for effect?

• ARCHITECTURAL LANGUAGE – DETAILS
- how do the details relate to those found in the general area?
  - imitating / interpreting / conflicting / individual?
- consider the relation/ratio of solid to void.

• ARCHITECTURAL LANGUAGE – MATERIALS/TEXTURES/COLOURS
- *‘unusual, distinctive, modern buildings [provided they are of sufficiently high design quality] can sit happily in the context of a historic street’*
- in relation to what is to be found in the area what is the quality of the materials proposed? - are they appropriate? - are they serviceable? [e.g. will they weather well over a period of time?]
- scale, texture, colour
  - do the proposed materials match or exceed the quality of the existing?
  - *‘traditional materials used in a new way can relate a building to its surroundings’*
  - *‘use of sympathetic materials can provide a visual link between old and new without the new copying the details of the old or pretending to be old’*
- what is the proposed build quality?
• **LANDSCAPE/PUBLIC SPACES/EXTERNAL WORKS/PLANTING**
  - have trees and other planting been provided? [n.b. tree planting should be encouraged in all schemes]
    - urban planting should generally be robust rather than overly decorative
  - in relation to what is to be found in the area what is the quality of surfacing materials? – are they serviceable and appropriate?
  - provision of sizeable public spaces can provide amenity value and balance increased densities in surrounding areas

• **SUSTAINABILITY – Environmental** – refer to considerations listed under 2.00 'Urban/Rural Design Appraisal'.

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4.00 **FINALLY**

.01 Two aims which are worthy of consideration for all development:-

‘Work to achieve excellence in the ordinary’
’Consider places before buildings so that new developments contribute positively to public spaces’
BIBLIOGRAPHY + REFERENCES

- SPPS DOE 2015
- 'By Design: Urban design in the planning system: towards better practice' 2000, CABE/DETR
- 'Urban Design Compendium’ 2 Parts, Aug 2000 and Sep 2007, Llewelyn-Davies on behalf of English Partnerships and The Housing Corporation
  [N. B. Both 'By Design' and the 'Urban Design Compendium' are now becoming dated but are still very relevant at a practical level]
- 'Building in Context: New Development in Historic Areas' CABE/English Heritage
- ‘Understanding Place: Historic Area assessments: Principles and Practice’ Jun 2010, English Heritage
- ‘Understanding Place: Conservation Area Designation, Appraisal and Management’ Mar 2011, English Heritage
- ‘Life Between Buildings: using public space’ 2011 Gehl, J.
- ‘Cities for People’ 2010, Gehl, J.
- ‘Photography and photomontage in landscape and visual impact assessment’ Landscape Institute Advice Note 01/11
- 'Local Government Waste Storage Guide for Northern Ireland' Sep 2010,

15 The content of some of these documents does not necessarily reflect planning legislation and policy in Northern Ireland and should be read accordingly. Refer also to the extensive references and bibliographies in 'Living Places' and 'Building on Tradition'

16 At this stage the SPPS is subject to clearance by the Executive Committee.
Annex 2 Listed Building Considerations

Considering the impacts of change

Many listed buildings can accommodate some degree of sensitive alteration to accommodate new or continuing uses. The extent of change that can be achieved without loss of special interest will however be different for each listed structure and is assessed on a case by case basis. A Design and Access Statement is a useful tool for applicants and decision makers to understand the impact of the proposed change on the significance of the heritage asset. This annex provides further detail on the suggested structure as outlined in Section 6.3 Heritage Considerations.

A. Statement of Significance

Before considering making an alteration to a listed building, applicants and agents should understand why the building is important and has been identified as a structure of special interest. Undertaking a statement of significance enables the applicant to properly assess and understand the significance of the asset and its setting. This understanding can then shape the decisions taken to sensitively address the change and assist decision makers in understanding the impact of the proposed change. Applicants should explain the architectural or historical importance of the building and its setting and this should be outlined in a ‘Statement of Significance’ (Refer to Section 6.3) as part of a D&AS.

The level of detail provided in a D&AS should be proportionate to the importance of the asset and the complexity and extent of the proposed change, to help local planning authorities make informed decisions. Pre-application consultation with interested parties and consideration of this annex can assist the Department, councils and applicants evaluate the impact of the proposed alteration on the special interest of a listed building.

A ‘Statement of Significance’ should explain why the building or structure is of architectural or historic importance. All listed structures have been assessed against the listing criteria (Ref. PPS6, Revised Annex C: Criteria for Listing, March 2011) which is a checklist of considerations, used to assess and evaluate if a building or structure is of ‘special interest.’ Further information on the listing status of buildings can be found on the listed building database [http://www.doeni.gov.uk/niea/other-index/content-databases/content-databases-build.htm](http://www.doeni.gov.uk/niea/other-index/content-databases/content-databases-build.htm)

The statutory criteria require an applicant to demonstrate how proposed building works take account of the building's architectural or historic importance, physical features and setting. This has been further refined under the following derived criteria (as referenced above):

- **architectural importance** - architectural style, proportion, ornamentation, plan form, spatial organisation, structural systems, innovatory qualities, quality of alterations, survival of interiors, setting and group value.
- **historical importance** – age, rarity, authenticity, historic significance, authorship, historical associations, social, cultural or economic importance.

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17 NB This will eventually be superseded by LDPs
18 The Planning (Listed Buildings) Regulations (Northern Ireland) 2015 Regulation 4(1)(b)
**physical features** - how historic features, external and internal, influence the special interest of a listed building. The following list identifies some examples of key building features which may shape the architectural character of a building:

**External Features**
- Historic shop fronts/ signage
- Wall finishes & techniques (e.g. brick, renders, stone, concrete, corrugated tin, timber, coursing, bond)
- Windows (e.g. metal, timber, fenestration treatment)
- Roof structure & materials (e.g. thatch, natural slate, lead work, pantiles, corrugated tin, Belfast trusses)
- Ironwork (e.g. railings, balconies, brackets, spires)
- Doorways and porches
- External lighting

![Above: Main Mill, Herdmans Mills, Sion Mills](image1)

![Above: Baronscourt, Newtownstewart](image2)

![Above: Camellia House, Shane's Castle, Randalstown](image3)
Internal Features

- Intact unique / original plan form
- Innovative / unique construction type
- Joinery (e.g. doors, skirting, architraves, panelling)
- Staircase / balustrading
- Ceiling finishes (e.g. detailed plasterwork - ceiling roses, cornices and ceiling)
- Floor finishes (e.g. timber, tiling, terrazzo, slate, mud)
- Wall finishes - (e.g. lincrusta, wallpaper, plasterwork, marbelling, distemper, lighting)
- Glazing (e.g. stained glass, crown glass, windows, partitions)
- Ironwork
- Fireplaces
- Original furniture
- Industrial machinery or processes
setting - The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting; the surroundings in which it is experienced. The careful management of change within the surroundings of heritage assets therefore makes an important contribution to the quality of the places in which we live. Proposals for an alteration to a listed building or heritage asset should therefore consider the following:

- Group value in a streetscape / related structures
- Setting in a planned landscape
- Site responsive setting – i.e. vernacular buildings
- Relationship between heritage assets and how they read / are seen together
- Keys view to and from the site – impact or contribution to historic skylines

Applicants should also refer to the NIEA Practice Guide – The Setting of Heritage Assets

B. Concept

Design & Access statements, accompanying an application for Listed Building Consent, should demonstrate an understanding of the context, how design principles have developed to arrive at a sympathetic solution and explain the expected benefits of the proposal. Where an aspect of the design has potential to harm the significance of heritage assets, a D&AS should explain why it is necessary and what measures have been taken to minimise its impact.
C. Impact Assessment

When considering a change to a listed building or its setting, applicants, agents and local planning authorities should consider the relevant policy and conservation principles as outlined in BS:7913 ‘The Principles of Conservation of Historic Buildings’ to assess how the proposals adhere to the following key principles:

- **Minimum Intervention**: Conservation is based upon a respect for the existing fabric and should involve the least possible physical intervention
- **Maximum Retention of Fabric**: Conservation should involve the greatest respect for, and involve the least possible loss of material of cultural heritage value
- **Reversibility**: The use of reversible processes is always to be preferred to allow the widest options for future development or the correction of unforeseen problems, or where the integrity of the resource could be affected
- **Legibility**: Replacements of missing parts should be distinguishable from the original so that restoration does not falsify the artistic or historic evidence.
- **Sustainability**: the point being to make sure that current use of the heritage, which is desirable, does not destroy the chances of handing it down to future generations

Questions for Departmental officers and councils to consider:

The questions posed in respect of general development (Annex 1) are equally applicable to listed building proposals. However the following questions aim to assist with the determination whether or not a listed building proposal has sensitively balanced the requirement for change against the conservation of the special interest of the listed building.

**Design Considerations:**

**Location**

- Where is the building located?
- What is the surrounding setting of the listed building?
- Is the building located within a designated area and how does the building contribute to the essential character of the area / streetscape?

**Use**

- Does the proposed use secure the upkeep and survival of the listed building?
- Does the proposal preserve or enhance the architectural or historic interest of the listed building?
- Is the proposed use sympathetic to the essential character of the listed building and its setting?
- What is the extent of change required to the historic fabric to achieve the proposed use?
- Will this change significantly affect or compromise the historic fabric of the listed building?
- Will the former use of the building still be appreciated?
- Is the proposed use economically viable to ensure sustainability of building use?
Amount

- How has the building and its setting changed from the date of construction?
- Does the amount of development compromise the essential character and setting of the building?
- Do densities compromise or complement those of the listed building?

  For residential development, this means the number of units for residential use and, for all other development, the proposed floor space for each proposed use. The D&AS should explain and justify the amount of development proposed for each use, how this will be distributed across the site and how the proposal relates to the site’s surroundings. In the case of residential developments an explanation of the proposed mix of dwelling type and tenure should be included. Densities should be calculated [bedspaces/hectare for residential, plot ratio for commercial]

Layout

- What is the surrounding setting of the listed building; urban streetscape, countryside, landscaped demesne?
- Does the layout preserve the importance of the listed building in its setting?
- What is the proximity of the proposal to the listed building?
- Has the layout been informed by historical appreciation through historic maps, references and research?
- Is the new development seen in juxtaposition with the listed building and does this enhance or detract from the character of the listed building and its setting?
- How are buildings and private / public spaces arranged on the site, what is the treatment of them, and the relationships between them and the buildings and spaces surrounding the site?

Height

- Does the height of any proposed building complement or dominate the height of the listed building and surrounding context?
- Does the proposed height of the building disrupt a historic skyline or long vistas of a listed building?

Scale

- Is the footprint of the proposal larger than that of the listed building?
- What is the contextual grain of the surrounding city / town / village / settlement?
- What is the scale of the surrounding buildings?

Massing

- Does the massing integrate with the form and size of the listed building?

19 PPS6 Planning Archaeology and the Built Heritage [NB These considerations will be incorporated into LDPs once the Plan Strategy is adopted]
Materials
- What are the material specifications found on the listed building?
- How does this material influence the special character of the listed building?
- What are the material specifications of adjacent buildings?
- Where alterations are proposed to the listed building, do the material specifications match those found on the listed building?

Landscape
- Have historic maps been considered to inform landscape proposals?
- Has the demesne, parkland, garden or grounds been laid out to complement the design or function of the building?
- Have public realm proposals considered impacts on the character of a settlement?
- Have details of the hard and soft landscaping proposals been provided with material specifications?
- Do landscaping proposals describe arrangements for maintenance?

Appearance
- For an application involving signage proposals, does the size, scale and material finish of the signage complement the character of the listed building?
- Is the lighting proposal sympathetic to character of the building?
- How does the building read in its context?
- How does the fenestration treatment respond to that of any adjacent listed buildings and surrounding buildings?
- Does the application provide the required level of detail to show how the proposal will sit in its context, either with contextual maps, contextual elevations, site sections or 3D visuals?

Sustainability
- Does the proposal comply with the Local Development Plan?
- Will the proposal help to stimulate economic prosperity?
- Does the scheme offer social / community benefits?

Access Considerations:
Inclusive access as a planning consideration seeks to find ways to overcome barriers to access, especially in relation to physical obstructions. This relates to access arrangements around and into a building; internal access arrangements however, though generally not a material planning consideration, are addressed separately as part of Building Regulation and DDA assessment.

Applications relating to proposed changes to a listed building, either internally or externally, will require Listed Building Consent (LBC). For LBC applications for internal changes to provide inclusive access, the accompanying D&AS should include a section on access. The access statement should describe and justify how the decisions have been made, based on a detailed consideration of the ‘statement of significance’ to
understand, eliminate or mitigate the impact of the proposal upon the architectural and historical special interest of the building.

Departmental officers and councils when assessing applications that relate to internal access changes to a listed building, or planning permission that affects a listed building, should therefore consider the following questions:

- What needs to be improved – the building or the access management, or both?
- What does the ‘statement of significance’ identify as the special interest of the building?
- What are the proposed changes and do they impact on the special interest?
- Has the proposal considered all alternative access options in terms of the physical building and management of the building?
- How has the proposal taken account of the ‘significance’ of the listed building?
- What measures have been taken to minimise or eliminate the impact of the proposals upon the special interest of the building?
- For applications relating to planning permission, if there are no access issues then the statement needs to explain this.

Departmental officers and councils should also consider the following questions in relation to the impact of the access upon the essential character of the listed building.

**Horizontal Movement**

**External**
- Does the access proposal preserve historic material finishes such as cobbles, stone slabs, pebble footpaths etc?
- Does the proposal detrimentally impact upon the setting of the listed building, e.g. in the planned landscape of a historic demesne, in the streetscape, etc.?

**Internal**
- Does the proposal impact on door openings, thresholds, corridors and how does this change impact on the historic fabric of the building?
- Does the proposal involve any visual contrasting and how does this alteration impact on the character of the listed building?

**Vertical Movement**

**Ramps**
- Is there a necessity for a ramp – can the ground level be changed to omit a ramp i.e. < 1:20?
- Will the position of the ramp impact on the architectural character of the building?
- What are the proposed materials and how do they take account of the architectural treatment of the listed building?
- Does the proposed ramp compromise the symmetry, balance or proportions of the facade?
▪ How has the proposal or how could the proposed be revised to complement the building’s symmetry to minimise its impact upon the character of the listed building?
▪ Can the impact of new railings be minimised or eliminated with the use of alternative guarding such as dense hedging / planting?
▪ Can the impact of the railing be reduced or concealed e.g. handrail fixed only to the building?
▪ Where plinth walls are proposed to the side of a ramp, have they been designed with a horizontal emphasis to sit sympathetically with the character of the listed building?
▪ Do the detailed design of ramps and handrails detract from the character of the building?

Lifts
▪ Is the installation of a lift necessary?
▪ Can user facilities be sympathetically provided on the ground / entrance level?
▪ Does the proposal sympathetically integrate the lift into the building without compromising the integrity of the floor plan, rooms and historic fabric?
▪ Will the service provision for a lift impact on the historic fabric e.g. roof profile, ground floors, etc.?
▪ Where an external lift is proposed, has this been sensitively designed and integrated to consolidate the character and architectural treatment of the listed building?

Stairs
▪ Can the main staircase be retained in its original form?
▪ Can alternative access solutions be found?
▪ Can a secondary staircase be upgraded to satisfy the requirements of e.g. building regulations?
▪ Is there a requirement to alter handrails and how has this been sympathetically managed?
▪ Is there a requirement for contrasting nosings on staircases – does the proposal sensitively preserve its essential character?

Lights, Signs and Information
▪ Does the signage compliment the character of the listed building and its setting?
▪ Do the material finishes set off the character of the building?
▪ Is the signage consistent, clear, and easily legible?
▪ Has the location and positioning of the signage been carefully considered so as not to obstruct any architectural features of the building?
▪ Do the lighting proposals require alteration to the historic fabric for rewiring?
▪ Does the lighting specification and design detract from the architectural style of the listed building?

D. Consultation
Early consultation with Building Control and NIEA Historic Building Unit is required to understand the requirements under building regulations and planning policy. Careful consideration of both requirements against the significance of the building is required to achieve a balanced and sensitive design solution supporting the provision of inclusive access for all.
E. Management Strategy

Where inclusive access cannot be accommodated due to the impact on historic fabric, management strategies to provide alternative access arrangements should be put in place.
Heritage Information Sources

- Listed Building Database
  [http://www.doeni.gov.uk/niea/other-index/content-databases/content-databases-build.htm](http://www.doeni.gov.uk/niea/other-index/content-databases/content-databases-build.htm)

- PRONI Records

- Built Heritage Map Viewer

- Monuments & Buildings Record – Waterman House, 5-33 Hill street, Belfast

- Queens University Library - Belfast
  [http://www.qub.ac.uk/directorates/InformationServices/TheLibrary/](http://www.qub.ac.uk/directorates/InformationServices/TheLibrary/)
BACK COVER