

Review of Design and Access Statements in Wales

Appendices



Collaboration by design

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Literature review references

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Appendix 2

Review of guidance documents

Title:	Access Statements
Published by:	The Disability Rights Commission
Publication date:	2003

This document introduced the concept of the 'Access Statement'. It was developed for the DRC by the Built Environment Group (BEG) set up under the (then) Disabled Persons Transport Advisory Committee (DPTAC) to identify and describe the use of Statements, and primarily how they would work in association with the introduction of the concept within the Approved Document to Part M (ADM 2004) of the Building Regulations.

When coming into effect, ADM 2004 identified that the information contained within it was based on the guidance within BS 8300, and was concerned that this may present a more 'prescriptive' Approved Document than those related to other Building Regulations. To address this ADM 2004 emphasised that:

"It must always be borne in mind however that the guidance contained in this AD is designed to indicate one way in which the Requirements may be met. There may be other, equally satisfactory ways of meeting the Requirements."

It also states that:

"Where the applicant wishes to depart from the guidance in Approved Document M to achieve a better solution, to provide a more convenient solution or to address constraints of an existing building, the Statement should set out the reasons for departing from the guidance and the rationale for the design approach adopted."

The vehicle justifying for such alternative proposals is the Access Statement, and ADM 2004 also specifically identified this DRC publication as the source of further guidance on the overall Access Statement process.

ADM 2004 also stated that:

“To assist building control bodies in making judgements about whether proposals make reasonable provision, therefore, it is recommended that an Access Statement should be provided.....”

This clearly identifies the status of the Access Statement as a ‘recommendation’ rather than as being ‘mandatory’, and is one that has continued in subsequent revisions to ADM in 2010 and 2013.

However, the Access Statement process identified in this DRC publication extended beyond that of the Statement being simply a vehicle for use at Building Regulation application stage. The document is the first of any related to the Access Statements or Design and Access Statements to describe the concept of the ‘Access Statement Loop’ which describes the role and benefits that can be accrued from using a Statement at the briefing, planning, design and post-occupancy stages of a development.

It also identified the situation in 2004 with regard to the purely advisory status of Access Statements, something which changed in May 2004 with the introduction of Design and Access Statements as a mandatory requirement for most planning applications under the Planning and Compulsory Purchase Act (P&CPA 2004). The status of Statements at the other three stages of a development (briefing, design and post-occupancy) remains as recommendations only.

The DRC guidance also included example of Access Statements that could be appropriate to each of the four stages, either individually or in combinations.

It did not include reference to the ‘Design and Access Statement’ as this had yet to be introduced by the P&CPA 2004. Therefore, titles in the DRC document the for the recommended access statement at each stage were:

- Stage One - Strategic Access Statement
- Stage Two - The Access Statement at Planning
- Stage Three - The Access Statement at Design
- Stage Four - The Occupancy Access Statement

The DRC document created the concept of the Access Statement 'growing' with a project through the above stages. It identified that such a move would assist continuity and would act as a vehicle for recording and explaining decisions on accessibility associated with the planning, design and on-going management of a project. It also suggested that the Statement would provide:

- a convenient vehicle by which particular design decisions that do not follow published best practice still, nonetheless, met obligations of 'reasonable provision';
- the vehicle by which developers and those managing buildings could demonstrate how well they were meeting the various legal obligations placed upon them; and
- provide an audit trail of the decision making process.

It also emphasised the importance of undertaking consultation with user groups and clearly identifying in any Statement the degree to which the findings of the consultation had influence the design process and decisions taken.

The information contained within the document is now out of date in some respects, for example with regard to its reference to the Disability Discrimination Acts (DDAs) and non-reference to the P&CPA 2004. It is also a document of its time, namely one that was heavily influenced by the impact and scope of the DDA. As such it tends to focus on addressing the needs of disabled people as opposed to considering the broader issues for a much more diverse range of users groups that are now covered by the Equality Act 2010, something which current Statements need to also address.

Nonetheless, it also still contains very useful and relevant background information about the thinking that led to the development of the Access Statement process and helps in the illustrating the reasoning behind the concept.

The information and concepts it introduces, such as the Access Statement Loop, form the guidelines on which subsequent advice and guidance on the use of Access Statements and Design and Access Statements is founded.

Title: Design and Access Statements in Wales:
Why, What and How

Published by: Design Commission for Wales

Publication Date: October 2008 (Revised in 2011)

This publication was first published in 2008 by the Design Commission for Wales (DCfW) to act as a companion to the 'Planning and Inclusive Design (Access Statements) Final Interim Guidance' issued by the Welsh Assembly Government (WAG) in 2007. It was subsequently updated in 2011 (DAS 2011) to take into account changes in Technical Advice Note 12 (TAN 12) in 2009 and the Introduction of UK-wide legislation in the form of the Equality Act 2010 (EA 2010).

In general terms, DAS 2011 identifies and describes the responsibilities placed on those involved in the development process in Wales by national planning policy to raising standards of the design of the built environment. It also illustrates the concept of the Design and Access Statement (DAS) and the important and mandatory role they play in the planning and development process.

The information in DAS 2011 takes its origins from guidance on Access Statements initially published by the (then) Disability Rights Commission (DRC) in 2003 and guidance published by the Commission for Architecture in the Built Environment in England (CABE) in 2006. However, the information contained in DAS 2011:

- is more specifically related to the use of Design and Access Statements than that in the former; and
- offers considerably more information on the relevance, creation and use of Design and Access Statements in the planning and development process than that given in the latter.

The guidance contained in this document relates back to the original DRC guidance in terms of;

- identifying the and role and benefits of the Statement process in the development of places and spaces that meet established principles of inclusive design;

- clearly identifying how Statements can be created and should be interpreted throughout the development cycle from inception to occupancy;
- explaining the evolution and difference between Access Statements under ADM 2004 and Design and Access Statements under planning legislation and regulations; and
- illustrating the relationship of Design and Access Statements and the Equality Act 2010.

The document has been prepared to assist the planning and development process in Wales and there are specific references documents and processes such as Technical advice Notes (TANs) and Planning Policy Wales (PPW). There is however a wealth of valuable and generic guidance that is relevant to all those creating and interpreting Statements across the UK. This publication is without question the leading source of advice and guidance on the use of Design and Access Statements that is currently available.

Title: Access Statement Guidance

Published by: Planning Aid Wales

Publication Date: February 2011

This publication gives general level information about accessibility and inclusive design. It also introduces the concept of Design and Access Statements, their intended purpose, role and key principles for their creation. In that respect it identifies the 'why' and gives some information about the 'when' Design and Access Statements should be used, but it is limited in terms of guidance on 'how'.

It is, in essence, an information document and in that respect it is a very good publication for raising awareness and introducing the concept of Statements. It covers the importance of consultation with disabled people, access groups and appropriate inclusive design professionals in the design and development process. It also has a useful section of basic level general questions and answers.

Whilst it is not a document that would be of extended use to design and planning professionals it is nonetheless a useful source of first level advice and guidance.

Title: Design and Access Statements: How to Write, Read and Use Them

Published by: Commission for Architecture and the Built Environment

Publication Date: June 2006 (Revised in 2007)

This guidance, which was first published in 2006 and revised in 2007, describes the type and level of information that should be included in any Design and Access Statement which accompanies a planning application. It emphasises the need for the Statement to explain:

- the principles and concepts that have informed the selected design;
- any other associated issues that have been considered during that process; and

- how the access issues for users of the development have been identified and addressed.

The document is divided into separate sections of guidance, including one for those involved in the process of writing a statement and one for those involved in the process of reading a statement

The publication identifies that although Design and Access Statements are likely to comprise of two components, namely one for Design and one for Access, they should not be considered as two separate documents during the preparation of the overall Statement. For example it states that:

“Much of the preliminary work that needs to be done for the design component will inform the access component and vice versa.”

The publication identifies the areas that should be addressed in creating the Design Component, namely, the use of the building or space, the amount of development proposed, the layout of the development, its scale in terms of size, how landscape will be designed, and what the appearance of the development will be. It also states that the Access Component should demonstrate appropriate vehicular and transport links to the site and detail how the design enables users to move through and around the space easily, safely, comfortably and independently regardless of their age, disability, ethnicity or social grouping. The document also identifies the importance of consultation with users in formulating both the initial design and the Design and Access Statement itself.

Unfortunately, whilst initially stating the importance of considering the components of Design and Access together in formulating a Statement, the publication devotes the majority of its text to issues related to Design and only a small proportion to that of Access. The link between the two areas is also not fully established.

As such, it is a publication that offers limited practical guidance to designers or those preparing Design and Access Statement on ‘how’ it should be done to ensure both components are appropriately co-ordinated and conjoined. It also does not clearly identify ‘what’ the end product should be able to achieve, or what it should look like. Overall therefore it is an interesting read but it does not offer the

level of practical guidance and explanation given in the DRC publication which preceded it or the DCfW publication which has followed it.

Title: Design and Access Statements Explained

Published by: Urban Design Group

Publication Date: April 2008

Published in 2008, this publication makes reference to the Disability Discrimination Acts that were in force at the time. The impact of the current Equality Act 2010 on the relevance of the guidance given is not covered.

In terms of access and inclusive design, the publication identifies the DRC document published in 2003 as a useful source of guidance. Unfortunately, the way in which it then describes how access issues can be included in the Statement process is not fully in keeping with that DRC guidance. This perhaps helps to explain some inconsistencies that are apparent throughout this publication relating to the appropriate use of the terms 'Design Statements' and 'Design and Access Statements'.

For example, the title of the publication initially suggests that its main intention is to explain to those involved in the design and planning process the purpose, role, function, make-up and creation of the 'Design and Access Statement'. However, the guidance almost exclusively uses the term 'Design Statement' and it is not until page 18 that there is a 'justification' about why:

- reference has been made to 'Design Statements' rather than 'Design and Access Statements';
- the term, in the view of the author, 'Design and Access Statement' is confusing; and
- the term 'Design Statement' is actually sufficient and appropriate because access issues should be included within that title and not identified as a separate issue.

The text points out that 'Design Statements' have been in existence for some time and the need to change this title to 'Design and Access Statement' is unnecessary (see point three above).

That however raises the question that if it is possible to ensure that accessibility and inclusion issues are appropriately considered within a document called a 'Design Statement', why are there so many examples of older and recently completed developments in the built environment which clearly show this has not been delivered?

In addition, the introduction of the 'Design and Access Statement' as a mandatory requirement under the Planning and Compulsory Purchase Act 2004 clearly identified that Government had identified that access and inclusion issues were not being appropriately considered and that legislative action was needed.

Overall, the quality of the guidance in the publication would have been enhanced, and I feel, the reader less confused, if:

- such views of the author had been raised at the beginning of the text rather than 25% of the way through; and
- there was greater consistency in the terminology used. For example having used the term 'Design Statement' throughout the publication, the final Section (Part Four) is entitled "Checklist for preparing a Design and Access Statement". The supporting text then refers solely to the term "Design Statement".

In the Foreword, the writer refers exclusively to the term 'Design and Access Statement' and does not seem to embrace the terms used within the rest of the publication.

Generally such inconsistencies and the unilateral change of name to 'Design Statements' and away from that used across legislation, planning regulations and all other established guidance documents, detracts significantly from the overall quality of this publication. It has also created guidance that is confusing and would be especially so those who have not prepared or read a 'Design Statement' (or is it a 'Design and Access Statement') before, and are wishing to learn about why, what and how to do it.

That is unfortunate because the use of graphics and sketches is user friendly and some of the information is pertinent and useful to those involved in the creation and use of Statements. How useful it will be however, is likely to depend on how well the reader can decipher the guidance given the change of name and the level of inconsistencies within the text.

Title: Design and Access Statements: How to use them to prevent crime

Published by: Secured by Design

Publication Date: July 2010

This publication considers the use of Design and Access Statements from the perhaps slightly unfamiliar aspect of influencing accessibility, inclusivity and safety of people using places and spaces through crime prevention.

As well as general guidance on what constitutes a Design and Access Statement, this document goes on to draw the attention of those preparing and reading them to the existence of other planning related guidance such as 'Safe Places – The Planning System and crime Prevention', which was published by the (then) Office of the Deputy Prime Minister and the Home Office in 2004.

It identifies the benefits of Design and Access Statement in illustrating to a determining planning authority that a proposal addresses the best practice guidance described in the Safe Places guidance in terms of addressing issues of crime prevention.

The document describes its recommendation in line with the headings found in the Safe Places guidance, namely those of Access and Movement; Structure; Surveillance; Ownership; Physical Protection; Activity; Management and Maintenance. It suggests that a good Design and Access Statement will address each of these issues in full.

This publication identifies and describes a series of extremely important issues related to the safe, convenient and independent

use of places and spaces, and is an important source of guidance not provided in other publications.

A short (21 page) document but an important one, especially for those not familiar with the role of crime prevention and how it affects, or is affected by, designing for accessibility and inclusion.

Title: Mandate 420 - Final Report to Phase I

Project Sponsors: The European Union (EU)

European Commission Standardisation Mandate M/420 (M/420) supports the European Accessibility Requirements for Public Procurement in the Built Environment.

The EU policy context for M/420 includes a long term strategic commitment to the protection and safeguarding of all human rights and fundamental freedoms of people with disabilities and to upholding the UN Convention on the Rights of Persons with Disabilities. The European Commission (EC) is also committed to using a Design for All approach to eliminate barriers in the built environment and also to ensure technical harmonisation and standardisation that enables the free movement of people, goods and services within the internal market.

It is estimated that approximately 16% of the EU GDP is publicly procured. Therefore strengthening accessibility requirements for the built environment through public procurement is an important means of achieving those goals.

The project is divided into two Phases. Phase I was a two year project that was complete in 2011 and its findings and recommendations were accepted by the EU in 2012. The start of Phase II is imminent.

Phase I

The work for Phase I included to following:

- developing an inventory of existing accessibility standards (codes, regulations and guidance documents for the built environment, including buildings, public places and transport

related facilities) used in European Member countries and internationally;

- identifying their use in public procurement;
- identifying and analysing gaps where no standards, codes, regulations or guidance exist or where the existing provisions need to be improved or increased;
- proposing a work programme for the delivery of two standards to be used as technical specifications or criteria for the award of public contracts comprising;
 - a) a set of functional European accessibility requirements for the built environment including outdoor spaces, buildings and products; and
 - b) minimum technical specifications to meet the functional requirements including technical criteria for use when renovating or adapting existing buildings.
- undertaking an analysis of existing conformity assessment schemes in EU Member countries and internationally for the built environment, buildings and products to meet accessibility requirements;
- consideration of possible procedures for the various stages and processes of conformity assessment for accessibility that can be used in public procurement;
- developing proposals for improving the selection of suppliers with appropriate technical capacity for delivering publicly procured services and products;
- developing proposals for the deliverables in Phase II.

Findings of Phase I

The study identified that there is a plethora of regulations, standards and guidance currently available to assist in the design and delivery of an accessible built environment. Whilst gaps do exist, (and in some cases that is apparent across several Member Countries), there are very few accessibility requirements and building elements

that are not appropriately covered by a regulation, standard or guidance somewhere in the EU or internationally.

The study also showed that the level and scope of guidance available on issues related to the needs of people with mobility impairments far exceeds that available for all other disabled groups.

The methods used to monitor and enforce regulations and standards vary amongst EU Member countries. This is, in part, due to the different legislative practices and policies adopted amongst EU Member countries, but it is also affected by differing cultural views and expectations of the roles which regulations and standards play within the construction process of individual Member States.

In general terms, the frameworks for conformity assessment in EU Member countries were found to be weak, with poor consideration for accessibility matters. While this study did not investigate specific cases of public tendering and conformity assessment, it was clear that the system of enforcement of legislation, regulation and guidance could be improved considerably in many countries, so as to ensure better building control practices.

It was also noted that simply introducing more regulations, mandates or directives or providing additional guidance documents without also addressing the widespread inadequate and ineffective conformity assessment and enforcement processes currently in place would be unlikely to improve the current situation.

The study has identified that there were many instances of good laws, standards and guidance covering different aspects of accessibility in many countries, reflecting different practices and priorities.

The study also found that it is possible to create a strategy and underlying ethos that will deliver built environments that are both accessible and sustainable without creating additional financial or bureaucratic burdens on public bodies or the public purse. However, any benefits of reducing overall expenditure by eliminating costly re-work and the under-utilisation or inappropriate ordering of deliverables will only be achievable if Design-for-All is considered as a fundamental and inherent part of the procurement process.

For EU public procurement a common approach should draw on good examples and establish common references and procedures which all countries can refer to and follow. This will provide, for the first time, a shared language and common tools for developing accessible built environments through public procurement.

In terms of conformity and assessment, the study identified that scant regard is paid amongst many EU Member States to conformity assessment and enforcement of legislation, regulation and guidance.

The reasons for this vary with influencing factors including:

- how enforcement is controlled within individual countries; and
- how its importance is perceived.

Variations in approach include those ranging from systems that are totally hands-off throughout the development process once an initial permit to build has been obtained, to a lack of adequate inspection and authorisation of completed works by compliance assessment bodies.

In most situations, successful compliance with any regulation, standard and guidance will depend upon enforcement and the level of expectation amongst those providing the built environment that transgressions from the regulations will be robustly and effectively challenged.

It is clear from the study that the systems are generally not working in practice and there are clear shortcomings in both of these areas.

It is also clear from this study that the experience, qualifications and professional expertise in accessibility, inclusion and Design-for-All of those who are responsible for ensuring compliance or conformity with regulations and standards varies considerably across EU Member States. In most cases training and levels of experience in such issues are inadequate and contribute to the lack of actual accessibility of the finished projects.

A move by the EU to develop an EU wide 'competent persons' scheme similar to that currently found in some Member countries to establish and monitor professional standards for competence and

expertise amongst accessibility professionals could go some way to improving the delivery of accessible built environments.

Recommendations (accepted by the EU in 2012)

The recommendations emanating from the study are that the EU should develop:

- a strategy whereby the principles of inclusive Design are adopted and established as a **fundamental deliverable** of any procurement process for publicly funded projects;
- guidance, in the form of a toolkit for public procurers, showing how to clearly identify the legal requirements for equality and inclusion, how they should be addressed in developing accessible, inclusive built environments, who should be involved in the process and who is responsible for ensuring delivery;
- a common EU wide Standard for 'Accessibility in the Built Environment' comprising basic functional requirements and technical specifications, and which will apply to both new buildings and the renovation of existing ones;

Note:

These proposed EU wide documents and conformity assessment procedures would not replace existing systems of legislation, guidance and control in the EU Member Countries, but would serve as basic, minimum requirements and specifications. It must be decided by EU and national lawmakers whether these should be enforced by EU legislation or possibly, with respect to Community-funded projects, as a requirement in all cases where funding is granted for built environment design and construction works.

- an EU wide accreditation system for professionals involved in the delivery of accessible built environments;
- EU legislation to ensure the enforcement of the standards, including effective measures to deal with non-compliance;
- the development of EU wide legislation to enforce the requirements for all public procurements and in the framework of the Construction Product Regulation; and

- an EU model for tendering and conformity assessment including the adoption of an **Access Statement Process** and competent person schemes designed to address accessibility throughout the public procurement process.

Note:

The Access Statement Loop as described in the DRC guidance on Access Statements and the DCfW guidance on Design and Access Statements is included in the accepted EU report as a model for operating a structured Access Statement Process on an EU-wide basis.

Phase II (starting in 2013)

To deliver:

- one functional and one technical European Standard; and
- an online toolkit with guidance material for procurers of publicly funded built environment projects.

Appendix 3

Review of LPA guidance

Authority	LPA Guidance	Review of Web Page and Guidance
Isle of Anglesey County Council	Editable Design and Access PDF document available to download from website	<p>The 11 page PDF takes the applicant through the different elements of the DAS identifying areas relevant for planning applications and additional elements for listed building consent.</p> <p>“A Design and Access Statement will explain and justify the objectives and concepts of good design on which a development proposal is based and how these will be reflected throughout the scheme. Further guidance is available in Technical Advice Note 12: Design (2009).”</p> <p>Part 1: Design covers design principles and concepts in relation to the five elements of design outlined in TAN 12, constraints and opportunities, and additional considerations for listed building consents.</p> <p>Part 2: Accessibility covers the policy approach to access and how specific access issues have been addressed.</p> <p>Appendix 2 sets out how to assess a Design and Access Statement.</p> <p>There are no opportunities to insert images into the PDF document</p>
Blaenau Gwent	One page advice document on Access Statements	<p>The web page provides very limited information about making a planning application. The advice document is provided as a ‘related document’ but is not referred to in the text.</p> <p>Despite the title only referring to access, the</p>

		<p>document introduces the requirement for Design and Access Statements from June 2009.</p> <p>Web links are provided to legislation and TAN 12 as well as the consultation draft of TAN 22.</p> <p>The guidance documents from the following are also referenced:</p> <ul style="list-style-type: none"> • CABE, Design and Access Statements: How to write, read and use them (2006) • DCfW: Design and Access Statements in Wales Why, What and How (2008) • WLGA: Shaping the Way we Work, Live and Play: Practical guidance on delivering sustainable development through the planning system (2007) • PAS: Design and Access Statements: Report from a 'learning group' comprising 16 local planning authorities (2008) <p>Planning Advice Note 7: Validation Requirements for Planning and Related Applications sets out the need for a DAS.</p>
Bridgend	Design and Access Statement Notes	The 13 page document contains paragraphs 6.8 and 6.9 together with Appendix 1 from TAN 12 providing the requirement for and guidance on Design and Access Statements.
Brecon Beacons	Planning Guidance Note on Access Statements, Draft June 2007	<p>A 13 page document setting out the requirement for Access Statements from 2007 and what should be contained within the document.</p> <p>The web page notes the change in requirements to Design and Access Statements from 1st June (no year given) and that the Authority is updating its guidance. In</p>

		the interim period a link is provided to TAN 12 and the DCfW guidance document.
Caerphilly	Caerphilly provide their own Design and Access Statements Information Sheets for planning applications and listed building consent	<p>Planning Applications</p> <p>Sets out the purpose and requirements of DAS. States that as a minimum it should cover the five key elements of TAN 12. Plans, elevations, sections, photographs and illustrations are recommended and applicants are advised to employ a professional such as a planner or architect to help prepare a DAS if problems are encountered.</p> <p>The guidance sets out three stages to the design part of the statement:</p> <ul style="list-style-type: none"> • Design principles and concepts • Development context • How the design responds to the context and delivers the principles <p>The second part addresses access including response to policy and demonstrating access to the site/development.</p> <p>Links are provided to further advice including Building Regulations Part M, British Standard 8300:2009 and the Disability Discrimination Act 2005</p> <p>Listed Building Consent</p> <p>This information sheet follows a similar format to that outlined above. In this case the design principles should take account of the special architectural or historic importance of the building, the particular physical features of the building that justify its designation as a listed building and the building's setting.</p>

		Web page also provides a link to TAN 12.
Cardiff	Design and Access Statement Guidance Note, May 2011	<p>This 12 page document sets out the purpose and requirements for DAS.</p> <p>It sets out the importance of inclusive design, making reference to the Equality Act 2010 as well as guidance from Planning Aid Wales on access statements and Cadw's document Overcoming te Barriers: Providing Physical Access to Historic Buildings.</p> <p>The document sets out key components of DAS as:</p> <ul style="list-style-type: none"> • Site analysis • Context analysis • Policy context • Design analysis – covering the objectives of good design as set out in TAN 12 <p>Appendix 1 of the document provides a checklist of issues that should be considered as part of a DAS</p> <p>Guidance is provided on the additional considerations for listed building consent.</p> <p>The content of a DAS for an outline application is differentiated from a full application.</p> <p>Reference is made to Cardiff Council Design Guidance as well as TAN 12, TAN 22 and the guidance document from DCfW</p>
Carmarthen shire	Information sheets for full planning, outline planning and	<p>Sets out the requirements for DAS and the need to cover the five key elements of design from TAN 12 as a minimum.</p> <p>Reference to TAN 12 and TAN 22 for further</p>

	listed building consent application	<p>information.</p> <p>“The DAS is an opportunity for you to explain and justify your proposals. It must be fit for purpose and ‘readily identifiable’ as meeting the statutory requirements, therefore you should include each of the headings set out below (and over) in your DAS.”</p>
Ceredigion	Guidance on web page	<p>Outlines the requirement for DAS and how it should work in conjunction with the Code for Sustainable Homes Assessment and, for listed building consent applications in conjunction with a Heritage Statement.</p> <p>Stresses the importance of DAS as a living document “It is considered good practice that the Design and Access Statement is seen as a living document that should grow with the project, the principles of the DAS should be considered throughout the stages of design, gaining planning consent, building and beyond. It is a statutory requirement to submit a statement at the application stage; however good practice is that a statement is initiated at the briefing stage and then grows as the various stages that inform and influence the design process are reached.”</p> <p>Reference to TAN 12, DAS guidance from Welsh Assembly Government, and Design Commission for Wales</p>
Conwy	Note on requirements for planning applications and listed building consent	<p>Paragraphs extracted from Town and Country Planning (General Development Procedure) (Amendment) (Wales) Order 2009</p> <p>Reference to TAN 12</p>
Denbigh-	Best practice	The guidance document outlines the

shire	document on information required with planning applications	<p>information necessary to accompany planning applications. It sets out a checklist of information that should be included with different applications. This does not include DAS.</p> <p>Design statements and Access Statements are referred to separately in the supporting information section. It states that design statements are “applicable for all applications where design is an issue in accordance with advice in Technical Advice Note 12: Design.” Reference is made to CABEs document for further guidance.</p> <p>Access statements should be submitted with all outline and detailed planning applications.</p>
Flintshire	<p>Information note on Design and Access Statements</p> <p>Sample documents</p>	<p>The information sets out the requirement for DAS, highlighting the five main principles set out in TAN 12. It states that “the intention is to make developers aware of these issues when schemes are being drawn up and the DAS should therefore be in preparation from the start of the scheme.”</p> <p>The guidance suggests that the DAS should contain a general section covering the vision, analysis, review of planning policy and guidance and details of pre-application discussions. This would then be followed by a section on each of the five design principles.</p> <p>The website also provides examples of what are considered to be high quality DAS for a housing estate, single dwelling and commercial development.</p>
Gwynedd	Wind turbine application checklist	A checklist is provided for Wind Turbine applications. This includes DAS and the guidance advises that “there are 8 things to consider – use, amount, layout, scale,

	Validation Requirements document	<p>landscaping, appearance, access and inclusive access in relation to relevant national and local planning policy and guidance.</p> <p>A document providing guidance on planning application validation requirements is available. This outlines the requirements for a DAS and the principles set out in TAN 12.</p> <p>TAN 12 is referred to for further guidance.</p>
Merthyr Tydfil	No bespoke guidance	<p>The web page provides a link to:</p> <ul style="list-style-type: none"> • WAG two page guidance on DAS • Access Statement Guidance from Planning Aid Wales, 2011 • DCfW guidance • TAN 12
Monmouthshire	Three examples of DAS for different types of application	<p>Example DAS provided for:</p> <ul style="list-style-type: none"> • Full planning and conservation area application (24 pages, no plans or images of proposed development included in the document) • Solar array (3 pages) • Conversion of redundant listed building (1 page) <p>Web page also provides a link to:</p> <ul style="list-style-type: none"> • Planning Aid Wales documents web page • Appendix 1 of TAN 12 • Two page WG guidance • DCfW document
Neath Port Talbot	Format for Access Statements	<p>The access statements page on the website refers to the need for an access statement from June 2007. The Format for Access</p>

	<p>document</p> <p>Design and Access Statement guidance document (within the access statements section)</p>	<p>Statements document is a one page guidance setting out what is required within the statement.</p> <p>The guidance document on DAS is a 20 page document providing examples of the typical and expected topics and sections to be addressed in the DAS. It refers to TAN 12 and the Model Design Guide for Wales. It includes sections on:</p> <ul style="list-style-type: none"> • Vision • Introduction and site location • Site analysis – opportunities and constraints (to include annotated plans, photographs and supporting text) • Context assessment • Involvement/consultation • Design evolution • Design solutions • Community safety • Character • Environmental sustainability • Movement and access <p>There is a section within the guidance that sets out BREEAM and CFSH requirements and how these should relate to DAS.</p>
Newport	Design and Access Statement Advisory Note	<p>The Advisory Note sets out what DAS is, why it is required, when it is required and what it should provide. It states that “a design statement is not simply a justification of a pre-determined design solution” and emphasises that the DAS should be a living document</p> <p>Refers to TAN 12, TAN 22 and PPW</p>

		<p>It includes further advice on producing design statements:</p> <ul style="list-style-type: none"> • Design and Access Statements in Wales: Why, What and How. Design Commission for Wales, October 2008. • Design and Access Statements: How to write, read and use them. CABE. • Access Statements. Disability Rights Commission, 2004. • Make it Accessible. RNIB Cymru, 2004. • Planning and Access for Disabled People: A Good Practice Guide. ODPM, 2003. • The Principles of Inclusive Design (They Include You). CABE, 2006. • Overcoming the Barriers, Providing Physical Access to Historic Buildings. Cadw, 2002.
Pembroke-shire	No bespoke guidance, requirements set out on web page	<p>Web page refers to TAN 12 and TAN22 and provides links to:</p> <ul style="list-style-type: none"> • DCfW document • Chapter 4 of PPW – Planning for Sustainable Buildings • CABE document • Model Design Guide for Wales • PPW Interim Guidance of Design and Access Statements (May 2009) • Planning Aid Wales Access Statement Guidance
Pembroke-shire Coast	No bespoke guidance or mention of	The planning application web page states that Policy 53 of the Local Development Plan requires that a Transport Statement be

	DAS	<p>included with all applications.</p> <p>There is no mention of DAS or other requirements. Pre-application advice is offered via a form on the website. On completion of the form providing details of the proposed development, the authority will reply with whether an application is needed and what information will be required if it is. A reply will be provided within 30 days.</p>
Powys	Design and Access Statements Briefing Note (May 2009)	<p>The three page briefing note sets out the need for, requirements of a DAS for planning applications and listed building applications.</p> <p>Refers to TAN 12 and DCfW document.</p>
RCT	No bespoke guidance	<p>Link to TAN 12</p> <p>Planning Portal guidance notes provided</p>
Snowdonia	Guidance documents on DAS requirements for planning applications and listed building applications	<p>The guidance documents are two pages each for planning applications and listed building applications. They set out what the document must contain with reference to TAN 12. It states that “if any Design and Access statement does not include all of the elements referred to above the application will be made invalid” and the DAS must have an “appropriate level of information to complexity of proposals, including illustrations/plans”.</p>
Swansea	<p>Guidance documents on DAS for:</p> <p>Full Planning Applications</p> <p>Listed building consent</p> <p>Outline</p>	<p>Three page guidance documents on what should go into DASs. Includes bullet points of what should be included in each section. It states that the DAS should be “readily identifiable” as meeting the statutory requirements and therefore should include each of the headings set out. It says that DAS should include illustrations, plans, photos and sketches as appropriate and refers to TAN 12</p>

	planning applications	and TAN 22. A link is provided to the DAS legislation.
Torfaen	Note on DAS Requirements (May 2009)	A two page note on the requirement for Design and Access Statements which refers to TAN 12. The planning application checklist on the website asks for a “Design and/or Inclusive Access Statement”.
Vale of Glamorgan	A Guide to Planning in the Vale of Glamorgan Links to:	The Guide to Planning in the Vale of Glamorgan contains a section on the requirement and role of DAS as well as broad content of DAS. It provides links to: <ul style="list-style-type: none"> • Two page WG guidance on Design and Access Statements • Two page Planning for Sustainable Buildings guidance • Interim guidance on Design and Access Statements, WAG, May 2009 • Previous VoG Guidance for Access Statements • Previous VoG Guidance for Design Statements The previous Guidance for Access Statements is a five page document on the role and content of access statements. The previous Guidance for Design Statements refers to the DCfW document and sets out the process and content of a design statement.
Wrexham	Design and Access Statement Information Sheet	A four page information sheet sets out the requirement and purpose of the document. It states that the DAS should not be a document simply written to accompany a planning application. It should provide an account of the whole design process from when a site

	<p>Local Planning Guidance Note 6: Access to and Use of Buildings</p> <p>Local Planning Guidance Note 30: Design – A guide for developers and architects when designing residential developments</p>	<p>was purchased/leased, to initial ideas right through to the final design stage.</p> <p>The information sheet sets out what a DAS would be expected to contain and how it should cover the five elements of design as set out in TAN 12.</p> <p>It refers to:</p> <ul style="list-style-type: none"> • TAN 12 • DCfW document • Ministerial Interim Planning Policy Statement 01/2009 'Planning for Sustainable Buildings' • Overcoming the Barriers, Providing Physical Access to Historic Buildings, Cadw, 2002 • Wrexham Local Planning Guidance Notes <p>Guidance Note 6 has been prepared by the council to “foster a better standard of design and to encourage designers and developers to consider the needs of people fully during early design stages”. It states that it is <i>recommended</i> that an Access Statement be provided with any application.</p> <p>Note 6 sets out information relating to elements of design relating to getting to the site, entering the building and moving around the building.</p> <p>Guidance Note 30 amplifies development plan policies on encouraging good design. It relates to TAN 12, the Model Design Guide for Wales and Manual for Streets. It covers:</p> <ul style="list-style-type: none"> • A sustainable approach
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		<ul style="list-style-type: none">• The design process• Site appraisal• The constraints and opportunities plan• A sustainable design solution <p>The guidance makes regular references to what will be required within the DAS. It states that “applications of poor design or not justified in the Design and Access Statement will be refused”.</p> <p>Page six provides a design statement checklist which covers site layout, the form of the buildings, the external appearance and landscaping.</p>
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Appendix 4

Questionnaire Feedback

Individual comments on the process of producing a DAS

- Our Council takes a hard line on DAS content and insist it meets all the criteria in TAN 12 but ... the Planning Inspectorate have undermined our position by accepting an appeal against non-determination which we considered invalid because the DAS was inadequate.
- For minor works it is quite often the case that LPA officers only tend to read the DAS for registration purposes as the drawings and information on the application form are generally enough to consider the application.
- Planning authorities have played games with the DAS, refusing validation for silly minor reasons.
- Designing out crime should form part of any DAS but most submissions are clearly inadequate
- Elements such as disabled access are controlled by Building Regulations and have no place in the design process. Community safety is too vague and woolly to be part of a planning application, and historically Secured by Design requirements have had an adverse effect on designs.
- Planning officers lack the appropriate skills/authority and do not know how to negotiate serious issues with [other] professionals.
- As a person who has scrutinized Planning applications for 25 years on behalf of disabled people I have been very disappointed by some DAS ... I would like to see more info on footway layout at road junctions, detail and location of bus stop design. Is public transport easily accessible to disabled and older people? DAS often give info on the nearest rail station but never say if it is accessible to disabled people.
- Agents still seem to think the quote 'this scheme is DDA compliant' is sufficient even though it is unachievable as the DDA does not give a prescribed definition.

- Passing comment on access when there is clearly no alteration to access is a waste of time.
- I feel it is a mistake to graft an access statement onto the design statement [for a] listed building - anyone looking at Table 1 in TAN 12 would think the access part is the most important, but more often than not its completely irrelevant.
- A poor DAS doesn't mean that design is poor - just that agents are unaware of their importance in explaining/ justifying a scheme.
- I consider DAS a totally bureaucratic waste of time and money and add nothing to the design process.
- The DAS is generally a 'sledgehammer to crack a nut'. Some authorities require the same level of information, whether you're proposing a nuclear power plant, a school and 250 houses, or a simple shop front alteration or a flue pipe on the side of an industrial building.
- Local authorities scrutinise a DAS and [delay] the validation of an application until a full and thorough DAS is prepared, and then ... completely ignore everything that is written in it.
- Architects' designs ... are generated from a lifetime of experience and training. The DAS is very often a retrospective tool to tick a box and has no implications [for] the finished proposal.
- Architects ... sometimes have an attitude that they should not have to explain or justify their design.
- [in a DAS] ...there should be no requirement to demonstrate compliance with local plans and policies. This is part of a Planning Officer's fundamental knowledge and it should not be a requirement to re-state for each application.
- The applicability of certain aspects of the DAS, such as movement and community safety, for schemes in rural areas is not clear.
- There is considerable pressure on architects' fees and the cost of preparing the DAS is a huge burden as it is expected to be absorbed within already dwindling fees. On a circa £4M project a DAS normally takes one person at least 4 weeks to prepare.

The DAS should be abolished in its current format as we find the current TAN 12 requirements result in a very unwieldy document.

- There should be a DAS template for a small, medium and large project so that everyone knows the benchmark.
- A good DAS can be a useful tool, particularly on sensitive sites like conservation areas or for explaining the rationale behind larger schemes.
- Under current legislation a DAS is required for most developments including applications for the relaxation of conditions such as for extending the opening hours of a takeaway. It makes little sense to require a DAS in these circumstances.
- Whilst the intention of the DAS to indicate the design evolution of the development is laudable, the reality seems to be that it is cobbled together as an afterthought. Do local authority planners have enough knowledge of design to assess a good/bad DAS or do they just look for the 5 headings?
- Our access group works with two planning authorities, one of which takes access statements much less seriously than the other.
- The greatest problem I see with DASs is that they are designed for larger applications and it is very difficult to see how the existing legislation and guidance meaningfully applies to the smaller applications.
- My personal focus has been on equine planning applications in respect of stables, field shelters etc. The principles of DAS are totally irrelevant and a nonsense when applied to such private facilities.
- From my point of view as an Access Group Chair and parent of a wheelchair user the Access Statement is an invaluable tool to get a quick grasp of a scheme without spending time poring over plans. They also have the benefit for me that they use words rather than graphics and it provides me with the opportunity to assess the designer's grasp of inclusive design and attitude towards disabled people.

- Some examples of when they are needed are ridiculous, e.g. for a fence around a school field, or for a variation of retail goods condition on an 1970s tin shed...The requirement makes planning bureaucratic and disproportionate and gives us a bad name.

Individual comments on the impact of DAS

- A local authority planner with no design qualifications is not in a position to judge whether a DAS is good or bad.
- Local authority planning officers do not seem to read DAS reports.
- Examples of good DAS are required for different types of development.
- When prepared properly, they can be very effective in explaining a scheme's evolution and explaining the design approach - but this is rare.
- Professionals should be aware of the impact on their designs without the need to express it in words.
- I find it a blunt instrument in the face of almost unbelievable crassness and incompetence.
- I have seen no evidence of it making any difference to the outcomes.
- They are churned out because they have to be to validate an application without much reference being given to the particular scheme in hand.
- My initial reaction to DAS was that it was positive in terms of answering certain questions that I would have needed to otherwise ask. However, the DAS has become too standardised
- The demands of DAS should be proportionate to the scale and complexity of the proposed development.
- I would doubt that committee members would view a DAS although reports may quote from them.

- They should not be abolished, but LPA's need to be tougher on the standard that is accepted - this needs to be across the board of all LPA's in Wales. Local residents are interested in DAS but they do not know a good one from a bad one.
- Whilst I agree with the last statement that they are ineffective, I do not believe they should be abolished. They do need to be improved.
- I do not think the whole concept of a DAS should be abolished, but it should only be required for larger applications and those which raise particular design issues. I also feel the legislation on them should be simpler, so it becomes less of a "ticking the box" exercise, to get something valid.
- The DAS goes some way to explain the thinking process behind a scheme but do little to extend the thinking or improve the design

Appendix 5

Workshop attendees

Alan Hunt	Pembroke CC
Alwyn Nixon	PINS
Candice Coombs	WG
Catryn Holzinger	WLGA
Chris Jones	LABC
Daniel Hodgkiss	Persimmon Homes
David Morgan	RICS
Dion Thomas	WG
Geraint Roberts	WG Dev Management
Huw Jenkins	Swansea CC
Ian Whiteford	Dyfed Powys Police
Jon Brown	South Wales Police
Karen Maddock-Jones	Natural Resources Wales
Rhian Davies	Disability Wales
Rob Chapman	Dyfed Powys Police
Robert Gravelle	Cardiff Council
Roisin Wilmott	RTPI
Sarah Thomas	Gwent Police
Steve Smith	Blaenau Gwent CBC
Wendy Richards	DCfW

Appendix 6

Feedback from workshop groups

Summary Point	Group 1	Group 2	Group3
Benefits			
Theoretically a good idea	The principle of DAS is sound but...	There was a strong sense that DAS were “theoretically” a good idea, and if well done were useful, but that the theory and the reality do not often match, as many or a significant number are not well done or appropriate. Theoretically, they provide the design story of the scheme in a compact document. Ideally (and especially for large scale projects) they have emerged after consultations with local communities that are directly influenced by the suggested scheme.	Agreement that DASs had various potential benefits, but the difficulty is that these are often not realised
More people are thinking more about design DAS are now well	The DAS encourages people to think about the story of a scheme and the process behind	They have got design and design issues on the agenda at the start of the planning process and required developers/designers to engage in a wide	DASs useful in providing the opportunity to think about access etc, but that thinking about these issues

<p>integrated into the planning process</p> <p>Provides the opportunity to think about access</p>	<p>the design. It helps to break it down into its component parts.</p> <p>Unclear how much can be attributed to DAS vs general increase in awareness of quality of design in society.</p>	<p>range of design issues.</p> <p>They have established design and design issues as a formal part of the planning process. The documents are also well integrated in the planning process.</p>	<p>carefully is often overridden by a 'box-ticking' mentality with very little thinking evident in many DASs</p>
<p>Allow the designer to explain design decisions</p>	<p>It enables the designer to explain and justify the proposed design</p>	<p>They have allowed the design process to be recorded to provide evidence of thinking and design evolution which helps explain and interpret the design that features in the planning application. They justify concern for design at an early stage.</p>	<p>DASs also felt to offer potential of acting as a record of the reasons certain decisions were made, or act as a 'thread' to explain a scheme. Compromises could also be usefully explained through DASs. This 'qualitative' element of DASs was valued</p>
<p>They help other people understand a planning application</p>	<p>It is helpful for committee members for understanding the scheme and provides a good summary</p>	<p>They can, if well done, help planners, councillors, consultees and the public understand what has and what hasn't been included in a planning application. They are</p>	

		useful at the appeal stage as they show whether certain issues have been taken into consideration and how. They help to inform officers' judgement regarding the merits of a planning application.	
Promote consultation and involvement and enable people to engage in the process	<p>DAS process should involve people and incorporate pre-app consultation but this doesn't always happen.</p> <p>Having the DAS for internal consultation allows building reg issues to be identified early before building regs application.</p>		DASs were reported to be a useful mechanism that various groups could openly contribute to, and were therefore valued for providing such an opportunity that was not available through other mechanisms
Explain relationship to context		They provide evidence of whether and how a context to a site has been understood and interpreted.	
Some evidence of improving design	Some see better building design as a result of DAS		Some evidence that DASs are proving beneficial – example given

	requirement		<p>of where only through the production of a DAS and consultation with police were any anti-terrorism provisions incorporated into a supermarket scheme (Morrisons, Newport Road – also referred to Admiral Building, Cardiff). Positive reference also to Royal Mint Visitor centre where ‘double positives’ on access and community safety were achieved through the DAS (access ramp acting as a defence barrier)</p>
Useful mechanism for addressing community safety			<p>DAS acts as a vehicle for addressing many community safety issues that are not presently addressed through compliance with building regulations</p>

<p>Helps to “future-proof” a scheme</p>	<p>The DAS helps the designer to consider wider need and therefore helps to future-proof the proposals in particular access</p>		
<p>Issues</p>			
<p>Quality inconsistencies</p>		<p>A good DAS does not necessarily mean a good design. A good design does not necessarily mean a good DAS</p>	<p>Costs of preparing DASs vary significantly, but noted that some producers of DASs turned out very good quality work, while that produced by others was poor</p>
<p>Wrong people writing the DAS DAS written at the end (post-rationalisation)</p>	<p>Some DAS are written after the design process is complete</p>	<p>Some DAS are compiled after the design work has been completed by people who were not involved in the design process.</p>	<p>A concern expressed that production of DASs delegated to less experienced staff by designers/ architects, with their low skill and experience being reflected in the quality of the DAS</p>
<p>Cut and paste Poor analysis</p>	<p>Documents can be cut and paste</p>	<p>Many DAS submitted by agents are just cut and pasted from previous documents and ignore the specific</p>	<p>Much ‘cut-and-pasting’ in DASs and evident that application of principles to the</p>

<p>Poor application of principles</p>		<p>features of a context or the issues relevant to a specific site. In many cases it is obvious that the place has not been visited at all and the information regarding the spatial and social context comes from internet sources, without touching upon the real issues of the area. These DAS devalue the idea or purpose. There was a lengthy discussion about how such documents should be treated in validation and use</p>	<p>specific site concerned has not been considered. Reinforced by some in a 'template' approach, rather than a bespoke one. This was felt to be reinforced by producing that meets the local planning authority's 'pass standard'</p>
<p>Validation inconsistencies</p> <p>Lack of skills/ resources within LPAs</p>	<p>Inconsistencies in the way that DAS are dealt with by LPAs and within LPAs. Gaps in DAS have been seen as reason not to validate a planning application.</p> <p>Concern that the DAS is often read and evaluated by people who</p>	<p>Some authorities use officers to help validate DAS statements which involve a judgement of their quality and utility. In other areas DAS are accepted by admin staff if they conform to the most basic criteria. Some officers thought that DAS should not just meet a certain basic standard but properly reflect the spirit of the DAS idea in substance. If certain issues required of a DAS were not adequately dealt with</p>	<p>Reported that LPAs simply do not have the staff or resources to interpret and review the information submitted with applications at validation stage. Practices typically check for bare bones of a DAS and not its quality. That is, documents are assessed for 'mentions of' rather than the</p>

	<p>don't have the right knowledge and expertise to understand them – lack of design training within LPAs</p>	<p>they would be returned and the application not validated. Other participants thought that the quality of the DAS was less relevant to its validation, but that a poor DAS was evidence of poor design thinking, which might be treated accordingly. In general it is agreed that the way of validating DAS can be too mechanistic or that there is lack of confidence amongst some people who judge them. There was agreement that planning authorities should act consistently on this matter, and that clearer guidance and criteria might help</p>	<p>quality of their content or reasoning. The possibility was raised of using portal technologies to ensure compliance with standards for DAS content</p>
<p>Too long and lack focus</p> <p>Unnecessary inclusion of planning policy</p>	<p>Fear of not being validated leads to putting in too much information</p>	<p>There was a consensus that many DAS submitted are too long and contain a lot of superfluous information unrelated to the designs. This tends to be ignored by planning officers who will know the relevant policies and guidance. It was thought that long documents result from a lack of knowledge</p>	

		<p>and design skill of agents, or inconsistent treatment by planning authorities. It was agreed that certain things like a review of design or planning policies were not necessary, and that DAS should focus on context and site specific design issues only. In conjunction with the above, people in the group raised the issue of proportionality of information provided in DAS. Authors do not always appreciate whether the amount and type of content is justified relative to the scale or significance of the development and that the amount of information provided often seems disproportionate for small schemes, such as over analysing a rather “dull” context, for example.</p>	
<p>Required for too many forms of development</p>	<p>The need for DAS for small schemes was questioned and also general proportionality</p>	<p>There was a consensus that not all forms of development that currently require a DAS should have them. Section 73 applications were</p>	

	<p>of the length of the document in relation to the size and complexity of the scheme. This undermines the credibility of DAS.</p> <p>Level of detail is also an issue at different stages – outline vs full vs reserved matters applications</p>	<p>referred to a few times. Other forms of minor development (garages outside of the cartilage of a dwelling) were also referred to. We couldn't get a complete list. It was suggested that a list of specific forms of development in specific types of context <i>needing</i> a DAS might be established</p>	
DAS do not evolve	<p>Lack of flexibility – get forced into providing too much detail at an early stage which may need to change – especially with outline planning applications. This can lead to lack of design commitment.</p>	<p>It was noted that many DAS documents do not evolve and change with schemes, as was suggested by the DCFW guidance. So they come to reflect design thinking only at a certain stage of the design and development process</p>	
Reserved matters require-		<p>It was noted that DAS should probably be required for reserved</p>	

ments		matters applications, as here many design issues might be dealt with	
DAS and EIA requirements		Duplication of requirements between DAS and EIA. Sometimes they contradict	
Debate about the status of DAS and its use post planning	There was concern that the DAS is not always used in decision making – who/what is it for if it is not?	There was discussion about the status of DAS in the planning process. Some participants thought that they should be made statutory. Others felt that the fact that they formed a material consideration was adequate. It was noted that DAS can be referred to in a planning condition to help regulate the quality of matters referred to in a DAS but which might not appear in the approved plans	DASs failing to be followed through to on-site construction, with buildings on site deviating from submitted plans. Link to the issue of monitoring, enforcement and sanctions which were felt to be missing
Not all of the headings need to be covered in all DAS	Context analysis is not always relevant or its is done in a tokenistic way to tick the box	It was agreed that the headings were useful for all DAS, but that not all the issues were relevant for every form of development. It should be possible for developers and designers to say if an	

		issue is not relevant in a very brief way	
Bureaucratic and don't raise design standards	The valid/useful bits of the DAS get lost amongst all of the other information and the rest of the planning application.	DAS is one more document produced to comply with the legislation. It is unclear if design quality has changed with the adoption of DAS. There are few repercussions if a project does not stick to the DAS, unless the requirements are referred to in planning conditions. In this sense DAS are viewed as something that makes the application process more time consuming and expensive	
Lack of clarity regarding consultation			It is not always clear who should be contacted or consulted when preparing a DAS – a local authority list of contacts would be helpful. Key people are not being consulted. People need to be 'forced' to consult. However, the weaknesses of 'token contact' or

			<p>speaking with the wrong person were noted later. This could be remedied by an account of how that consultation had influenced the DAS. A concern was expressed that DASs are not encouraging a wider dialogue among interested parties</p>
<p>Access not being given due consideration</p>			<p>A concern was expressed for a view that 'if we're hitting the regulations in Part M then we're alright'.</p> <p>Access felt to be considered an 'add-on' feature rather than considered up-front and designed into schemes, often encouraged through the way the building and construction process works ('slam the ramp on at the end')</p> <p>The police were</p>

			<p>perceived to have 'clout' in addressing community safety issues, while access groups felt that they were easily 'gazumped' on access issues. Reference to other factors in the planning system that appear to be non-negotiable (protected species, bats), so why not on access? The potential to ensure that some issues could be defined as not being capable of being 'traded off'</p> <p>However there were some concerns about the capacity of some access groups to be able to provide input to the process of consultation on DASs</p>
Lack of access expertise with Local			<p>Access officers can provide a useful source of support and</p>

Authorities			reinforcement for planners in addressing access issues. In their absence it was felt that it was difficult for planners to promote access considerations
Negative perception from the beginning	There was a negative perception of DAS from their introduction in England before they were even introduced in Wales. This meant that they started on a bad footing. Perceived as a mechanism to prevent validation by LPAs		
Overlaps			
EIA document-ation		There is an overlap with EIA documentation when they are required	
Secured by Design		There is an overlap between Secured by Design thinking and DAS requirements, but there was no conflict	Building regs could be used for aspects of Safety by Design. And if they were, then that would be

			fine by him
Building regulations Part M	It is not appropriate to cover building regs in DAS but it is useful for building control to comment at the DAS stage to identify early issues.	There was some consensus that specific accessibility standards relating to the building envelope were best dealt with, and specifically enforced, by Building Regulations. It was suggested that movement and character were design issues often underplayed in DAS, as a result of the perceived bias towards specific access issues are clearly quantified and straightforward	Weak linkage exists between DASs and building control, with anecdotal evidence that DASs not ensuring key issues on lifts etc are being addressed before they get to building regulations stage Approved inspectors criticised for breaking potential link from development management through to building control. Approved inspectors also criticised for allowing developments that were not compliant with the building regulations No overlap. On the contrary, issue is that DAS doesn't take

			<p>enough account of the implications of the detailed internal design that will later be subject to Building Regs. Too often a DAS says 'Part M will be complied with', with no demonstration of how this will be done. Then, after pp is granted, detailed designing occurs, and in either Part M can't be complied with or in order to do it there are knock on effects on the design already approved. Either way, planning or building regs put in an awkward position. Compliance with building regs is not straightforward. Making the connections between design, construction, and maintenance is</p>
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			essential.
Building regulations Part L	There is a significant amount of overlap between building regs and planning (TAN 22). Many felt it shouldn't be covered in planning stage when it would be covered in building regs, apart from the main principles.		Thought BREEAM might disappear and Part L of building regs could do their job. Or community safety could go into Part M. Police could then be a consultee on applying the regs (as fire service is).
BREEAM			BREEAM does have some safety elements. From his perspective not wholly satisfactory : involves 3 rd party assessor, and a claim – on which 2 pts are awarded – but not necessarily any justification provided. In his experience, claims in relation to consultation with police can be misleading :

			eg may refer to a tel call to a policeman who is not qualified to advise on community safety. DAS allows for transparency; allows a testing of the quality of judgement, because a rationale should be provided
CfSH			The tick box approach to the Code for Sustainable Homes encourages some factors that contradict some of the objectives pursued through DASs. Only early, pre-planning stage considerations can properly address these
Future drainage/SU Ds requirements	Future regulations on drainage will influence matters that will impact the design of a scheme and,		

	therefore there will be some overlap. (Flood and Water Management Act 2010)		
Equality Act and Equality Impact Assessment			There may be duties and requirements addressed through the Equality Act and Equality Impact Assessment that extend beyond the requirements of DASs , particularly those related to protected characteristics – therefore DASs cannot be relied upon to satisfy all requirements related to equal access etc. It was noted that action in this respect had to be civil action, with no mechanism for regulatory bodies to enforce breaches of duties
Changes			

DAS supported in principle	Supported in principle	DAS were generally supported as a useful tool that contributes to the planning process	Don't throw away DAS – improve them
DAS shouldn't be required for all applications (or should)	Question why a DAS is needed for a small scheme	Require DAS for particular forms of scheme or particular settings. It was noted that small schemes and piecemeal development can be significant in Wales	Clear view expressed that DASs should apply to all forms and scales of development that they currently apply to. No support for 'rolling back' the application of DASs. Examples given of where even small scale development could be significant in terms of access and use of services, such as services in the high street. Smaller developments were also felt to have cumulative impact, including on community safety.
Change DAS requirements for		Where developments require an EIA the DAS	

EIA applications		could form part of the EIA	
Reduce the amount of unspecific, unnecessary information/text in the DAS	The design process could be covered in a series of drawings: constraints and opportunities, concept, framework, plan.	Need to find a way in which superfluous information is removed so that the DAS remain focussed on the context and site specific design issues, and remain proportionate to the significance of the scheme in its setting	However, this was backed up with a strong view on getting the proportionality of information requirements right for different scales and forms of development. A view was expressed that requirements should be expressed and framed in a way that made it easy or straightforward for developers to comply. DASs should help developers to comply and should not be onerous.
Allow some headings to be covered by a “not relevant” note		Encourage DAS authors to list the headings but indicate if the issue is not relevant to their development	
Remove overlap with		Remove the overlap with Building Regulations	

building regulations access requirements		access requirements/assessments in particular	
Use DAS to reinforce the need to have pre-application meetings and consultation	Use DAS to encourage a development team approach to bring people from LA into the process and pre-application meetings	Tie DAS requirements into a retained commitment to pre-application negotiations	Needs to be a more transparent document: setting out who was consulted, how and to what effect
Improve training	Those reading DAS and validating applications should have design training.		Training could be improved – for DC officers and producers of DAS.
Re-launch Provide new/update guidance			Need a re-launch – as, in effect the useful WG policy clarification letter of 2010 did. Guidance needs to be more prescriptive
Change name and/or			Change the name to Access and Design

headings			Statements Refer to 'Crime prevention and community safety' : will provide better signals and focus as to what needs to be addressed. Allied to better, more accessible guidance. Bear in mind that non-professionals produce and read DAS.
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Appendix 7

Case Study Summaries

(Cases have been anonymised)

A1 Retail

Type of application – Full planning application for the erection of retail supermarket with ancillary restaurant, car parking, servicing, landscaping, petrol filling station and car wash and new vehicular access. An Outline Application was previously submitted and approved.

Date - Submitted 2009, 8 months between submission and approval

Why it was selected – As an example of a large out of town A1 retail application that allows us look at the scale of the development and any issues relating to its location.

Overview of the DAS – 35 pages, A3, landscape. A mix of text, layouts, plans, elevations, photos, and a few architect's impressions of the proposed scheme. Half and half text and illustrations but with quite a lot of empty space. There is no presentation of the evolution of the design. However, a very strong justification for the scheme emerges with a rationale wrapped up in it in relation to a wider regeneration strategy for the area and its gateway location. "Its successful redevelopment is therefore important in both visual and image terms." A Local Authority development brief for the regeneration of the area was published in 2008 with the aim of creating a high quality mixed use waterside development around a river inlet. The DAS covers all the standardised headings of TAN 12 and uses them to address the Development Brief (DB) selectively in these respects.

There is a section on "Community and Stakeholder Consultation" which does not actually provide any information on community and stakeholder consultation. It states that the applicant values the importance of this in the planning process and refers to an accompanying document for the findings. There is no summary of the findings in the DAS itself.

There are a few pages of text and plans devoted to specifically outlining how the proposal meets some relevant key objectives of the DB. These include, and start with, the new vehicular access road and bridge which this proposal will be providing, followed by “Visual Prominence” stressing the importance of this site’s location as the new entrance to the regeneration area and so “... a welcoming contemporary highly glazed elevation is thus presented”, followed by more about the access road. Other DB objectives addressed in this section of the DAS include pedestrian connections but without actually meeting this objective in the design, and sustainability.

In a separate sustainability section of the DAS, half of it is a generalised description of the applicant’s approach to sustainability rather than site specific. It says it aims for BREEAM Very Good rating for this project and that a retail-experienced BREEAM advisor will be appointed pre-construction to manage this process. It goes on to list the opportunities that this site offers to maximise scoring. This BREEAM rating would match what the DB seeks to achieve.

Access section is weak.

How effective was the DAS as a communication tool and as a mechanism to improve design and development quality

A number of the DB’s objectives were not met by this scheme, but one of its most expensive and most important was – the provision of a new main access road into the regeneration area. The applicant appears to have been able to use the leverage of meeting this objective to avoid meeting other DB objectives (and other policies) which did not correspond with its own objectives. This is despite a statement in the DB that “any planning applications that are contrary to the vision for the area will be resisted”. The DAS in this case appears to have been used by the applicant as a persuasive document for the above purpose giving more weight and space to the mutual objectives and playing down or ignoring the non mutual objectives. This impression is supported by the architect’s view of the purpose of this DAS. In interview he said it was - to show that this development would be the catalyst for achieving the aspirations of the Development Brief’s.

As well as the DB there was a site-specific design brief for this site. It was published earlier than the DB during the previous outline application and the DB incorporates it, the DAS does not mention it. The council's Principal Urban Designer – a statutory consultee for the application - referred to both briefs in his comments. He said that whilst he had no objection to this project on this site he recommended the approach put forward be refused on design grounds. The DAS was listed as one of the documents on which his comments were based but he did not refer to it specifically.

These design grounds were: the standardised store design is not an exemplar scheme as required; a failure to provide good pedestrian permeability through the area; the inactive frontage of the rear elevation fronting a main access road; and the poor roof style given its visibility from the elevated trunk roads on the perimeter of the site, all of which were specified objectives in the DB or the site specific design brief, along with a layout dominated by car provision with pedestrian access as an after thought. Any subsequent design amendments in light of his comments didn't alter much as the comments still stand in relation to the finished design. Where a design departs from a design brief the DAS could be used to justify why this is. In this case it wasn't.

The architect said in interview that the DAS emerged in the last few months of the design process in tandem with the final design and it went through a few drafts during that time. Unfortunately the planning case officer was on maternity leave and not available to be interviewed. Her manager, in her place, knew little of the scheme so we do not know whether the DAS was referred to. The DAS was referred to in the committee report and decision but only under list of plans decision relates to. Here it was referred to as version C implying that amendments were required to it during the planning process. No other consultees referred to the DAS other than the urban designer.

The highways engineer said he scanned the DAS but it was not of use. He said they rarely are for the larger projects but for the smaller projects they are, sometimes. The EA officer didn't read the DAS and said she rarely does. She said that where there is no environmental statement or other relevant application information she might search the DAS for relevant information, but she doesn't

remember ever referring to a DAS in her response. The CCW officer who dealt with this application had left, but another officer said she doesn't usually read DAS because they don't contain the information she needs and they are not of sufficient detail.

The Development Brief guided the design more than DAS requirements.

Key Findings

The DAS in this case was not really used as a communication tool or as a mechanism to improve design and development quality. It appears to have played a part, instead, as a marketing tool.

Agricultural Development

Type of application – Full planning permission for the erection of a 3000-bird free range egg production unit, together with access improvements, landscaping and associated works.

Date - The application was first registered May 2011 but was withdrawn just before determination when it was found that the applicant had started on site prior to permission being granted, and what was built to date was not as proposed in the application. The applicant was then asked to submit a retrospective application instead which was registered in October 2011.

Why it was selected – As an example of an agricultural development which is a common type of development in Wales. Some questionnaire responses questioned the relevance of DAS for this type of application.

Overview of the DAS – The DAS is part of a larger document entitled Proposal Details and Management Plan - Design and Access Statement. The whole document is 17 pages in length, A4, portrait, mainly text with four photographs of chickens and an illustration of three boxes of eggs. Whilst the contents page indicates that the DAS starts on page 9 it's not really clear where it starts.

The document contains the following sections: Landscaping; Policy Context; Access Statement; Community Safety; Environmental

Design Statement; Physical Context; Social Context; and Economic Context, along with 13 other sections dealing with, for example, vehicle movements, drainage, manure storage, odour management, and dead bird management. The content of these sections is not very site specific and it is mainly descriptive.

There is no design evolution provided. Justification for the project appears on the last page under economic context, as survival of the existing farming business via diversification into egg production. The economic context also mentions planning policy Wales being supportive of agricultural diversification schemes and free range egg demand increasing. Local policies are listed and reproduced only.

There is consideration of the physical context with the poultry unit sited close to existing buildings and hedge and in a natural dip in the land to screen it from neighbours. There is a good description of how the poultry unit works regarding the free range egg production and the relationship of the different physical areas of the unit to each other. This covers size and materials, so some relevant aspects of character are described. Landscape screening is also addressed but its biodiversity potential is not.

The DAS outlines consultation with neighbours of the closest properties with no objections raised. It mentions no site constraints or opportunities bar the dip in the land above. Under Access a number of policy statements appear to have been reproduced. It states it has adopted an inclusive approach and that all users will have equal and convenient access to the site and buildings. Its evidence for this is the provision of level thresholds, level hard landscaping including around circumference of building, car park close to entrance - implying suitability for wheelchair users. No mention of access for any other users or emergency services, for example. Much of this is generic rather than site specific. Community Safety is mentioned as critical but not addressed in the design. Under Environmental Design Statement there is a list of short paragraphs of intent such as: orientation of building to maximise solar gain to reduce energy; wherever possible materials to be sourced locally and from renewable sources; avoidance of tropical timber.

How effective was the DAS as a communication tool

As stated above the DAS contains no design evolution but it does provide a reasonable explanation of how the poultry unit works. As it contains no plans or drawings of the site it provides little understanding of what the building will look like.

The planning officer said much of the technical information in the DAS was unreliable as it was not as built – even for the second application – so this wasn't useful for her, and there were also inconsistencies between the DAS and the application plans and the application form. She said the drainage proposal described in the DAS wasn't sustainable and environmental health manure plan described in the DAS was not acceptable so the information in the DAS enabled consultees to identify these deficiencies. However, the DAS wasn't referred to in her committee report or conditions because it didn't reflect accurately what was built.

The planning officer said she did find a little of the more general information about poultry farming in the DAS useful as she hadn't dealt with a poultry unit application before. She reinforced this by saying that she finds DAS a useful communication tool as DAS is better at giving her a picture of the proposed development than the application forms and drawings alone.

The poultry unit was an off the shelf unit designed by a Polish company and installed by a British supplier. The agent - a firm of chartered surveyors – prepared the planning application and DAS and had no direct contact with the above companies. The agent's client provided him with the documents he used to prepare the application. From interview the agent said his view of the DAS was to explain the design to the planning department by addressing what he knew would be their concerns. He said he used a previous DAS he or his firm had prepared for a larger poultry unit and watered it down for this project. Asked if he produced a draft, first, he said "The girl who works for me produced the draft and then I read it". The above two points might in part account for the inaccuracies and inconsistencies between the application documents and what was built, and between the DAS and the application plans and the application form.

The agent also said for agricultural applications, which his firm prepares a lot of, they use the DAS to justify, describe and explain every aspect of the project they think is necessary for the planners.

A lot of this information is not strictly DAS requirement. It's about the agricultural activity in order to get the planners to understand what they want to build and why it's necessary.

The land drainage engineer said he reads the DAS for all projects but tends to focus on any surface water disposal references within the DAS. He said the DAS in this case did not adequately consider or provide enough clarity on the surface water disposal arrangement. In fact, the DAS statement on this differed from the intent shown on the Planning Application form.

He added "Agents for developments of this scale do not generally appoint drainage/hydrologist consultants to properly consider the surface water disposal/flood risk impacts and therefore the drainage assessment within the DAS often lacks detail or a workable solution. In general, it is often found that the drainage elements within a DAS is a 'cut and paste' from previous submissions and I tend to find when modifications are made during the planning process, similar errors are repeated in subsequent applications. Given that the DAS should be read in conjunction with submitted drawings and all other relevant information, which are more than likely amended during the planning application process, it would be useful if the planning authority insisted that DASs are also modified and resubmitted during the planning application process to confirm any issues, corrections, deletions, additions of information that are identified by the various consultees during the planning process. This might prevent generic DASs being submitted by Agents for a particular type of development time and time again, which is not helpful and in my mind defeats the objective of the DAS submission".

The highways engineer said he reads the relevant sections of the DAS for his work. He said this DAS did not adequately consider the affect of the proposal on the local highway network and the extent of the highway infrastructure improvements required. He went on to say almost exactly the same as the land drainage engineer above.

How effective was the DAS as a mechanism to improve design and development quality

As the DAS was prepared by an agent after most of the design

decisions had been made by others it had little affect on the pre-application stage of design. During the application process one could argue that the DAS was useful in highlighting deficiencies in design. This led to improved design in many respects but Planning Authority took the route of using a lot of conditions attached to the permission as a way of getting the project built as they wanted e.g. with revisions to drainage, manure spreading, height of feed bins, landscape screening, access road requirements. This was difficult, time-consuming for a lot of public sector officers, and is still ongoing with Enforcement involved.

Key Findings

This was a particularly problematic case. Without more examples of agricultural cases one does not know how typical this was. However, the comments made by both the drainage and highways officers, in what is predominantly a rural local authority, suggest that such problems are not uncommon. As the underlying cause probably has more to do with the cost of employing designers for applicants than anything else, the DAS in its current form is probably an unsuitable mechanism for addressing such problems.

For agricultural projects there is a need for the applicant to explain to the planner the agricultural activity involved to enable the planner to understand the planning proposal. The DAS is currently being used as a general communication document for this purpose. The planning officer said she thought that 'one size fits all' DAS requirements for urban and rural developments are not appropriate as much of it is not applicable to rural developments. Therefore for agricultural projects the current DAS requirement used in this way seems to be requiring too much of the wrong information and not enough of the right information.

B2 Industrial Use

Type of application - Extension to existing industrial unit, doubling its size.

Date – Submitted November 2009

Why it was selected – As an example of a B2 industrial use which as a very functional use.

Overview of the DAS - 1 and a half pages, A4, portrait, all text. It provides no design evolution but an implied design rationale emerges for the new extension as being in keeping with the existing building and enhancing the building as a whole so as to make the new enlarged building more prestigious.

The DAS is very concise and completely site specific. It covers Accessibility; Character subdivided into The Building, Landscaping, and Drainage; Community Safety; and Environmental Sustainability with a reasonable number of relevant factors addressed for each. No policy context, consultations with public or others, or site constraints are mentioned. A reference to any physical context is restricted to a description of elements of the existing building.

The Accessibility section only mentions level access and level thresholds. There is no discussion of access for workers or others with any other impairments – deaf people, blind people etc. Under Environmental Sustainability it mentions: waste storage on site, with recyclables separated; building to be a very flexible space; new building to achieve a BREEAM Class B rating; highly insulated; low energy; 10% recycled building materials. Under Community Safety it says “[a]ll access points into the building ...[with one exception]... will be on the south east and south west elevations, which can be readily observed from the road. This natural surveillance will help act as a deterrent against crime”.

How effective was the DAS as a communication tool

The DAS provides a reasonably good justification of the design outcome. The planning officer said it was useful for providing him with a brief outline of the project. The DAS wasn't mentioned in his committee report or in conditions.

The client appointed a design and build contractor to design the building. The D&B contractor appointed an agent to prepare the planning application and DAS. The agent had no direct contact with the client. The D&B contractor didn't read the DAS. With its absence of illustrative material, the DAS reads as if it was written as an

addendum to the application plans for an audience of the planning officer only.

There are no drawings or photos or any other illustrative material in the DAS so it's impossible to get a picture of the design from the DAS.

How effective was the DAS as a mechanism to improve design and development quality

This extension was designed to fit in with the existing building by copying elements of it to some extent. Improved landscaping on one boundary was a condition to increase screening from the local village. Overall a reasonable design was achieved. However, the DAS appears to have played no part in this at any time. The DAS was mainly viewed as a necessary to get planning permission on the applicant side. There were design amendments but it was not asked for the DAS to be updated to reflect them.

Key Findings

This was a straightforward project. The DAS was useful for communication but did not impact on design.

Because most of the potential audiences for a DAS are not known personally by the DAS writer prior to application there is a risk that applicants will write the DAS with only the planning officer in mind. The fact that there are so many possible audiences for a DAS makes writing it problematic. It is unlikely that a DAS can be a very effective piece of communication for any particular audience if no clear audience is in mind when writing it.

Again, if the planning officer doesn't insist on the DAS being updated in line with design amendments the message he/she sends to the applicant is that the DAS is of little value. It is therefore unsurprising if applicants attach little value to it, too. It is also unlikely that a DAS could ever become a 'living document' in such circumstances.

B8 Industrial Use

Type of application – Full planning application for the erection of building for mixed use B1 (office) and B8 (storage)

Date – Registered October 2010

Why it was selected – as an example of B8 industrial use

Overview of the DAS – 14 pages, A3, landscape with a good mix of text, drawings and photos. Quite well laid out. Provides no design evolution or design rationale but does provide a reasonably good description of the project. Environmental sustainability, movement, character, community safety, physical and policy context, and access are all included. Most of the relevant factors are addressed and are site specific, however, it's apparent that two of the points made are inaccurate – see below.

The policy and physical context of the site are described, the latter quite well. Two site constraints – flood risk zone and access - are analysed and a solution provided. The Access section is weak with little mentioned apart from a reference to disabled parking, level access and Part M. No mention of provision for deaf, blind or partially sighted workers or visitors or access by public transport for them. Whilst level access to main entrance was achieved via a proposed long ramp, emergency fire exits were proposed to be stepped until amendments to this were required as part of planning process.

There is a statement of commitment to environmental sustainability both during and post construction which this company prides itself on, this includes: energy self sufficient via photovoltaic roof panels; heat exhaust pumps provided; and U values to exceed current building regulations. The DAS states development does not fall within BREEAM.

The community safety section contains six general safety statements which are then addressed for this specific site/project. Addressing “[s]urveillance: places where all publicly accessible spaces are overlooked” it says “[w]indows on the front elevations provide good natural surveillance over the parking”. What it fails to mention here is that most of the proposed parking is at the side of

the building and the side elevation contains few windows, suggesting that the DAS was not an integral part of this design.

This DAS was written by the owner/applicant/ developer/designer and the building developed for his own use as a base for his small construction company. Asked in interview what he saw as the function of the DAS he said “to provide what the planners require for registration”. His attitude was slightly contemptuous towards DAS.

How effective was the DAS as a communication tool

This DAS provides no design evolution or design rationale but does provide a reasonably good description of the project. There is some justification given for some of the design decisions for example, raising the floor level because of the flood risk zone.

The planning officer said in interview that the DAS didn't add much to his understanding of the proposal. Most of his understanding was acquired from the pre-app discussion.

There were several amendments including a revision to the roof design to make the building less prominent requested by the planning officer, a change to the finished floor level of the office requested by EA, a change to the position of the main entrance by the applicant, and some highways and access changes. The applicant said the planning officer asked for the DAS to be amended for the finished floor level change only. The planning officer said he did not ask for an amended DAS for the other changes because the information affected was in the plans and drawings. However, the DAS reproduced the plans and elevations in its illustrations so it was affected by other changes. The DAS was mentioned in the Committee Report and Decision Notice but only as an attached document the decision relates to.

Three statutory consultees interviewed – GGAT, EA and Highways – all said they read the DAS. EA officer said the DAS was helpful in that it gave the finished floor level for the building. GGAT officer said it wasn't helpful in this case but that she reads them anyway for a general picture of what is proposed. The highway engineer said he always scans the DAS for relevant sections such as Access and reads those sections. The local access group referred to a piece of

information in the DAS in their comments but this particular point did not result in a design amendment.

How effective was the DAS as a mechanism to improve design and development quality

The DAS requirement probably did make the applicant more aware of issues that should be considered in this case, and to some extent were considered. The owner designed and developed this building for his own needs and functionally he says it meets those needs well. However, aesthetically the building is a somewhat bland little office block with tin shed attached. This site is on a main access road close to and in full view of a significant local landmark. The site is a corner plot on a junction with this access road and there is a large sports field across the road. Whilst it is still an industrial area an opportunity to create something of better design quality perhaps reflecting elements of the iconic structure it faces has been lost. Instead the building reflects the surrounding nondescript industrial buildings and justifies its choice of materials and appearance as fitting in with those. Whilst it mentions both the landmark and park in its physical context description, it then more or less ignores them in its design.

One piece of information in the DAS – the finished floor level – highlighted a design deficiency and therefore was used to improve design.

The planning officer didn't see much value in DAS for small projects like this. He said they are frequently a tick box exercise to get the application registered. In some cases to achieve this he said he almost writes the DAS for the applicant because it's quicker.

Key Findings

The DAS was useful in providing a general picture of what's proposed for some of the consultees. It played a part in affecting the design of the finished floor level. However, as the proposed ffl was such an important piece of information it would no doubt have been requested by the EA even if it hadn't been available in the DAS.

The DAS was attached to the decision yet its illustrations conflicted with the amended application plans in some cases and therefore it did not reflect what was permitted. Requiring the applicant to revise

only some of the information and not all in the DAS undermines both respect for the DAS requirement and the planning application process generally, thus perpetuating contempt towards DAS. It is also unlikely that a DAS could ever become a living document in such circumstances.

A good DAS and good design, particularly aesthetic design, are not necessarily related. The requirement to write a DAS can raise the designer's consciousness of factors to be considered, but this can still remain an abstract paper exercise and not translate into better design, especially in cases where the designer is not particularly good or enlightened or committed to good design.

Large Residential Development

Type of application: 75 dwellings on a former industrial site by a volume house builder

Date: Planning permission was awarded November 2009

Why it was selected: The type of development is significant with many relevant design issues and a common perception that design quality for this type of development is not as good as it might be. The scheme is complete and lived in.

Overview of the DAS – This scheme had a DAS of only 5 written pages. The DAS predates the current requirements presented in TAN 12. The agent says that all DAS documents produced today follow the TAN 12 requirements and will be more detailed, including material from a Code for Sustainable Homes assessment. In relation to the design requirements, comments in this DAS are made about access, movement, character and community safety. In relation to these points the DAS states that the design has addressed these issues and provides a very broad sense of what has been done, but not in any detail. There is no evidence of context or site analysis and no vision, or opportunities or constraints presentation. There are no illustrations of the site, context or scheme. Reference is made to design policies and guidance, stating that they exist and have been followed. Many other points about the design of a residential area could have been made, and in general the DAS does not reflect all of the design issues considered for the development. The DAS was

submitted with the planning application and was not revised. Amendments were made to the designs through the planning approval process, but it was not considered necessary to reflect this in what was a very brief DAS.

How effective was the DAS as a communication tool

The DAS was approved as it considered the relevant headings. This DAS did not explain the design process, but was, instead a very brief explanation of the design. In relation to this type of development the DAS is considered of particular use to the council's design officer, the police architectural liaison officer and non-specialist people like neighbours to the site or councillors. The agent/designer and planning officer both felt that a DAS brings together an explanation of a scheme in one place and makes an understanding of the scheme easier, particularly for people who cannot read plans. In general they both supported the use of DAS for this purpose and felt it was valuable for the developer. The planning officer commented that on occasion a neighbour or councillor might refer to the content of a DAS as a basis for an objection, if they disagreed with the outcome, otherwise it was hard to judge if they were referred to. There were no objections to this particular development.

For the design officer and police architectural liaison officer, the DAS can provide evidence of thought, and might draw attention to, and justify a particular approach to the problems of a site. Like other professionals, however, these people will also bring their own criteria and judgements to bear on their consideration of a scheme. This means that once they have read the DAS, they will move on to look at the drawings and form their own view relative to what concerns them. The police architectural liaison officer is keen, in particular, to have information about the context as they may not be local to the site. The planning officer read the DAS, but did not rely on it. He was less concerned with design issues in an un-sensitive setting, and otherwise felt he knew the site and its context already. The form of development was also common, and based on his professional experience did not need explanation or justification. Other consultees did not look at the DAS. For example the highway officers refer directly to the plans to explore their limited range of concerns. The DAS referred to highway design issues, as the

scheme included a home zone treatment, but from a highway design perspective this is evident from reviewing the plans where the amount of information is much greater and more precise. In relation to this type of residential development the Council's access officer would not be consulted. There are many design issues of concern to an access officer, including for example, a concern about the use of shared surfaces, but the resourcing of the post seems to prohibit involvement.

How effective was the DAS as a mechanism to improve design and development quality

This scheme employed standard volume houses in what people agreed was an interesting layout which included a focal space at its centre. Some felt that the details of the homes, and the landscaping in particular, could be much better. The scheme was designed and submitted by a consultancy specialising in the design of such schemes with a strong track record and knowledge of the volume house builder product and planning and design norms. The DAS therefore reflected some of the design decisions made, but did not influence them. Landscape architects were involved, but only later in the design process, and in response to a planning condition relating to a landscape scheme. It was thought that the weight given to landscaping in the UK planning process is such that DAS requirements would not bring in landscape architects at an earlier stage on a site without an established landscape setting.

Both the designer/agent and planning officer referred to the value of pre-application negotiations as the basis for fixing the relevant design issues for an application of this type.

In this case the justification for the design outcome seems to have been reasonably self evident to the participants, as they were all familiar with the norms and standard of design being presented. The use of shared surfaces was a form of innovation which was drawn attention to, but the use of this idea was justified relative to national planning guidance in Manual for Streets. The DAS merely drew attention to this. In addition the council design officer made direct reference to local residential design guidance in her comments on the scheme. These, rather than work in the DAS, provide the benchmarks by which design quality was judged.

Professional consultees did request that greater permeability be considered for the site, and this had been positively addressed by the developer and designer in design amendments, but this design quality was rejected by neighbours and councillors who wanted to protect their own interests, despite the obvious benefit to future residents. This happened despite the DAS.

As a result of the planning process, effort was made to vary the house types in order to achieve surveillance of parking courts in order to meet neighbourhood safety concerns. This happened also despite the DAS, due to the involvement of police architectural liaison officers reviewing the plans.

It was noted that if a masterplan had been produced for a site such as this, that the masterplan rather than a supporting DAS might be referred to in a condition for any outline planning application.

In general, despite wider discussions about the mediocrity of volume residential housing schemes, the DAS was not a mechanism for raising the design quality of the homes in particular. The planning and design officer did state that they do get good DAS documents, but these tend to reflect the quality and aspirations of the designers and clients or a more sensitive setting of the scheme.

Key Findings

A DAS has a role as a communication device for large residential schemes of this nature. They are of particular value for professionals with an interest in design, as well as for neighbours, amenity groups and councillors.

A DAS did not shape conditions leading to better design through the planning system. This was done by national and local forms of design policy or guidance relating to aspects of residential development, implemented by good officers who are conversant with a range of design issues. This is normally achieved through pre-application negotiations and through the normal process of commenting on submitted applications.

Good residential designs are the product of a good client and designer, and they might be shaped by the sensitivity of a context which demands a good design. These circumstances tend to

produce a good DAS, reflecting rather than shaping a commitment to design.

Planning Application and Listed Building Consent

Type of application: Redevelopment of Grade II* Listed building to provide new public uses and demolish rear of existing building and erect a new extension.

Date: Submitted July 2009. Planning permission was granted October 2009.

Why it was selected: The planning application was selected because it relates to a listed building. The scheme involved conversion of an existing building for a public use, and also involved demolition and a new build extension. The scheme also forms part of a wider regeneration project.

Overview of the DAS – The DAS accompanying the planning application is a substantial document. The requirement for a DAS was a recent introduction at the time the planning application was submitted. The DAS was submitted in revised form during consideration of the planning application. The original DAS comprised around 50 pages of text and images. The revised version was expanded to around 60 pages leading to what the architect referred to as an ‘unwieldy’ document. The revision was submitted shortly before determination of the planning application at the request of the local planning authority. The weaknesses or omissions of the original DAS were summarised as: the absence of any reference to national and local planning policies; no explanation of how engagement with consultees had affected the design; the need to strengthen ‘the story’ of the design process; the need to strengthen consideration of community safety and environmental sustainability. The local planning authority requested that revisions be made in anticipation of sending the documentation to Cadw for the listed building consent. The short period between the submission of the revised DAS and the grant of planning permission suggests that the revisions were not central to deliberation on the planning merits of the scheme.

The DAS for this scheme also includes the ‘justification statement’ for the changes to the listed building (including partial demolition). Consequently, a single combined statement was produced.

The structure and content of the DAS follows very closely the advice included in TAN12. The architect explained the value of closely following the guidance to the letter to ensure that the DAS satisfied the requirements of the local planning authority, although this structure and the way it was checked for was felt to be prescriptive and encouraged repetition. The DAS was very well illustrated with photographs, maps, illustrative drawings and floor plans, as well as historical information. The scheme was contextualised within the wider town centre and as part of the town centre regeneration programme. The DAS distilled a series of design principles. These principles enshrine some of the key issues addressed through extensive pre-application discussions with a number of interested parties. These principles included those relating to design of the extension and compliance with the Disability Discrimination Act (DDA) on public accessibility.

How effective was the DAS as a communication tool

The DAS is a user-friendly and relatively easy to digest document in spite of its length. The photographs and illustrations are an important aspect of this. The architect stated that the DAS was often used as a document that helped consultees and participants ‘get up to speed quickly’ on the overall scheme. The client also used the DAS for similar purposes. It included all of the essential information to explain the outline of the scheme. The DAS therefore served an important function given the extensive and detailed plans and drawings that otherwise formed the information submitted to the local planning authority.

The DAS did refer to aspects of the design process, including the engagement of clients and user groups. However, the local planning authority identified that the original DAS did not adequately address the evolution of the proposal and needed to focus more on ‘telling the story’ of the design. The DAS is better at explaining the ‘case’ for the development and the treatment of the listed building and its features than it is in explaining the evolution of the design of the new build extension.

The DAS does not provide any evidence of consultation with access groups or access professionals as part of the process of devising the scheme. Similarly, the planning files held by the local planning authority do not identify any engagement of access groups or professionals. The architect referred in interview to engagement with such groups, even if they do not feature anywhere within the documentation forming the DAS or the officer files.

The DAS was identified by the architect and the client as having additional functions beyond its use in supporting the planning application. The DAS can also be useful as information sent to building contractors as it helps to explain the rationale for certain features that cannot be compromised when costing the building of a project. In effect, the DAS has an explanatory and justificatory function – it gives reasons to contractors for what has been specified. The availability of a DAS was also explained as being helpful to those engaged in land buying. For this scheme, the architect referred to the DAS being handed to the local authority building control team for information, although it has not been possible to confirm the link between the DAS and building control for this case study.

How effective was the DAS as a mechanism to improve design and development quality

The DAS was explained by the architect as an evolution from documents required earlier in the process of devising the scheme. An early document prepared for Cadw to secure their support for the general parameters of the scheme was explained as a prototype of the eventual DAS. So, in this case, the DAS evolved out of other documents required in relation to the listed building status of the property. These early discussions with Cadw were identified as central in explaining the evolution of the proposal.

Key issues of design and access appear to have been agreed as key principles early in the process, and so the DAS appears to have done little by itself to improve design and development quality. Early, pre-application discussions established that the architectural integrity of the scheme should not be compromised in ensuring access for all users. File documentation shows that there was an insistence on not removing the stepped access to the front of the building. Only some moderate re-profiling of the entrance was

therefore proposed. Wheelchair access via the main entrance was only made possible when street landscaping works raised the level of the pavement. Building managers noted this as an issue when the building first opened, although access has since been resolved. The architect and the client both referred to the scheme being designed in anticipation of future raising of the level of the pavement.

The DAS appears to have been a useful way of explaining the many challenges and compromises necessary in this complex project on a tightly-defined site, which aims to meet the requirements of multiple uses.

The DAS was referred to directly in the case officer's report to planning committee. It was not referred to in any of the conditions or advisory notes attached to the planning permission. The DAS was, however, tied into the conditions attached to the listed building consent. It is not clear why the DAS tied was tied into the listed building consent conditions and not those for the planning permission.

There was no evidence that the DAS was a 'living' document in relation to the on-going management of the building. Accessibility through the building has evolved as the building has been used. For example, the multiple uses of the building each with different hours of use, and the security of spaces and library stock mean that some aspects of access are not as originally envisaged.

Key Findings

The DAS can usefully provide a vehicle for combining the requirements on design and access with the justification statement for the changes proposed to the listed building.

The differing DAS requirements for listed buildings consents (e.g. external access only) and for planning applications did not appear important in the provision of a single Design and Access Statement for the submission of both applications.

The early setting of the parameters for changes to a listed building can set the important framework for how any design and access issues are addressed subsequently. The essential parameters for the project are set early in discussions with Cadw.

Revisions to a DAS were requested for the sake of completeness rather than based on any more substantial impact on the scheme itself.

Residential Development Under 10 Units

Type of application: Outline planning application for the demolition of existing buildings and the development of 1.6ha of land for residential purposes. This was followed by reserved matters applications for two phases of development; firstly Intensively Supported Independent Living (ISIL) units, and secondly six dwellings.

Date: The outline planning application was submitted in June 2009. The reserved matters application for the ISIL units and the residential units were submitted in December 2010 and February 2012 respectively.

Why it was selected: The application was selected as it comprised the development of fewer than 10 dwellings and therefore had the potential to cover different issues and considerations to large residential schemes on the one hand and single dwellings on the other. Consequently it allowed us to investigate the impact of the scale of development. This application also provides the opportunity to explore the role of the DAS in a reserved matters application following an outline planning application.

Overview of the DAS –

Outline

The initial Design and Access Statement that accompanied the outline planning application was prepared by the Local Authority as the applicant. The document is brief at 10 A4 pages including the cover and contents page. It is titled as a Planning, Design and Access Statement and was prepared to meet the new requirement for a DAS to accompany the application. There are no plans or images in the document and, with just a small amount of description, the analysis of the site is limited.

The presentation of the proposals is very descriptive and general. It was acknowledged by the author that there was limited information about the proposed scheme and recognised by the planning officer that a the DAS at this stage was difficult to prepare as little was known about the nature of the development, therefore it had limited value as it was very general.

The DAS contains sections under each of the headings in TAN 12 with site-specific but general information. Whilst planning is referred to in the title of the document there is no review of planning policy, although planning history is included. The case officer recounted that there was some confusion over whether or not a planning statement should be included in the DAS.

Reserved Matters

A Design and Access Progress Statement was provided with each of the reserved matters applications, prepared by the architects who designed the scheme. These were brief documents of four and seven pages with no images.

In preparation of the DAS the author referred to guidance provided on one of the Welsh Planning Authority web sites as this set out the requirements in Wales which differ from England.

With the exception of movement, each of the TAN 12 headings are expanded upon in the update statements. Reference is made to Approved Document part M, Lifetime Homes, Code for Sustainable Homes and Secured by Design.

How effective was the DAS as a communication tool

The DAS was referred to by all (the developer, designer and planning officer) as a good communication tool to explain the scheme. However, this was largely related to explaining the nature of the development rather than it's design. There was concern from some of the existing community about the proposed assisted living use on the site and the developer and designer regarded the DAS as an opportunity to convey the need for and purpose of the development.

The DAS provides a description of the development but the lack of images and plans in the document means that there is limited added

value over and above the plans that would have been submitted with the application anyway. The writer of the DAS said that much of this explanation and description might have gone into the covering letter had it not been in the DAS.

The planning officer generally makes use of the DAS in preparing the committee report as it provides a useful summary of the proposed development, especially if it covers planning policy. Rarely is the DAS used as part of a condition, partly due to the fact that it does not form part of the application. The officer feels that DASs should be essential for reserved matters applications.

The section on community safety explains how the scheme has been developed in consultation with the Police Architectural Liaison Officer to ensure that it complies with the principles of Secured by Design.

How effective was the DAS as a mechanism to improve design and development quality

The design of the scheme, particularly the assisted living units, was developed in close consultation with occupational health and other professionals who had very specific requirements for the development particularly in relation to access. Therefore the DAS was seen more as a tool to justify the design proposals. The DAS does not go into any great depth about the evolution of the design.

The very specific access requirements of the scheme determined many aspects of the design including the profiling of the site. It therefore has no issues with disabled access.

The architect felt that the DAS had no benefit on the design of the proposals. It was a fairly simple case where the constraints of the site were taken on board and a logical design process was followed. The DAS simply recorded this process at a later date. The potential value of a DAS is recognised for larger schemes where a concept develops over time.

The planning officer regarded this as a good scheme with a functional DAS. They would have liked to see more analysis of the site but there was enough detail for it to be accepted. A pre-application meeting was held with the architect which resulted in

some redesign of the road and layout but this would have happened without the DAS.

Overall the scheme is regarded as a success. The planning officer reported that some compliments have been received on the scheme and it has had a good public response, although this was attributed largely to the developer and not the process. The developer (who now acts as landlord for the scheme) also sees the development as a success with the properties fully occupied, performing well and people enjoying living there. The DAS has not been used as a living document following the planning process.

Key Findings

The significance of the DAS as a communication tool, particularly to explain the background to the project, was identified.

The DAS was viewed by all to have had limited or no value in improving the design of the scheme. A clear brief, competent designers and pre-application discussions were the salient factors in producing a “successful” scheme.

Difficulties in preparing a DAS at the outline planning stage when little detail is known about the proposed scheme were recognised. The content was very general and the planning officer would have liked to have seen more analysis at this stage.

City Centre Office Development

Type of application: reserved matters application for details of appearance, layout and landscaping of 6 -8 storey office block with undercroft parking and ground floor commercial/office facilities.

Date: approved August 2010; the building is still under construction.

Why it was selected: an example of a substantial commercial development in a city centre setting as well as a reserved matters application.

Overview of the DAS : The DAS is a 17 page landscape document, illustrated on more or less every page. It describes elements of the proposed development, but does not provide any design rationale or

account of its evolution beyond saying that it is designed so as to create flexible space (to maximise marketability) and will be of a quality commensurate with the city centre. In relation to access, a sensible list of what will be provided is given (eg dropped kerbs and well-illuminated footpaths), in relation to community safety the approach establishes objectives (natural surveillance), and then lists design features to promote safety – eg cycle sheds.

No well developed argument or approach emerges. BREEAM is mentioned - the building will achieve BREEAM 'very good'. This is supported by a summary table from a BREEAM pre-assessment report prepared by consultants. Overall, the DAS reads as something put together hurriedly, a view confirmed by the fact that the architect/agent for the scheme could not remember it at all. The document recapitulates elements of the earlier DAS (those which relate to this particular building), and adds elements which seem to be responses to the revision of TAN 12 in the period between outline and reserved matters applications.

How effective was the DAS as a communication tool.

The DAS does not feature as a focus in consultee responses, nor did the planning officer refer to it as being of significance in discussions of the application. The DAS does not provide a coherent, well structured account of and rationale for the development.

How effective was the DAS as a mechanism to improve design and development quality

The application form refers to pre-application discussion, and the council file and the case officer confirm that there were some discussions of details of the design after the submission of the application. The DAS appears to have been irrelevant to this process. There were amendments, but these were not reflected in any changes in the DAS. The key elements of this building had in reality been fixed in the DAS accompanying the outline application, and the DAS accompanying this application appears to have been an exercise in meeting a bureaucratic requirement. The case officer (an architect-planner) felt that the building was reasonably well designed; but this has been achieved by discussions and

negotiations of the kind which would have been familiar in any planning office for decades.

Key Findings

Taken together with the outline application, this case suggests that there has been no shift in culture or 'mind-set' by architects, applicants or planning officers consequent to the introduction of DAS. The applicants and case officers discussed design quality and improvements because of the nature of the development and its location. If a DAS has a useful role to play as an outcome/record of these (and other) discussions, as in the outline application, then it can be a fairly carefully written document; if it is not seen as having any useful role to play, then it becomes a matter of routine box-ticking, or worse. But the DAS requirement, in itself, does not prompt design quality (including access) to be centre stage.

Mixed Use Development Including Retail

Type of application: Outline application for mixed use development on a 3ha site currently in industrial use. All matters reserved except scale and access. Proposed uses include office, hotel, care home, student accommodation, and small amounts of A1/A3. Applicant was an experienced regionally-active developer, with a professional architectural firm as designers.

Date: Planning permission issued Dec 2009

Why it was selected: primarily as an example of a large commercial development in a city centre setting – these schemes raise conflicting issues : on the one hand, the expertise of architects is sometimes argued to make DAS superfluous; on the other, the scale of the scheme may make DAS important as a crystallisation of design rationale. The fact that the case was an outline application allowed an exploration of the scope expected of DAS in outline applications, and the implications of this for subsequent reserved matters applications.

Overview of the DAS: This DAS predated TAN 12 (2009), and used the term 'Design Statement', from the 2002 version of TAN 12. It is a substantial document – 56 A3 landscape pages, almost all

illustrated, with about 10,000 words of text. It is often referred to as a masterplan and contains a detailed layout of the disposition of buildings, internal circulation, linkages/access beyond the site, and massing of buildings. Elevational details are also given, and details of materials (for illustration). There are six pages of 'urban design concepts', and each block is described in terms of materials, solar control, a photo of an 'exemplar', elevation (1:200) to illustrate materials and axonometric projection to show the building on site.

The DAS contains no account of the evolution of the scheme (choices, options, etc), but a clear rationale emerges for the proposal for which consent is sought: the need for flexibility in uses (and possibly development form) in current market conditions, opportunities to vastly improve a pedestrian links through the site, and the creation of pleasant public spaces within the development by adopting a courtyard style layout. The DAS responds to DCfW comments on an earlier proposal by another developer, though DCfW was not entirely happy with the DAS.

There is no mention of BREEAM and energy-saving is discussed by simply describing, but not evaluating, options. Accessibility is discussed in general terms – cycle, walking, car. Reference to Part M is made and a commitment is made to a railway footbridge accessible to all.

The DAS refers to a large number of detailed technical studies which have informed the design process, and occasionally summarises relevant conclusions; these studies were also submitted with the application. The DAS is therefore a kind of reference point and framework for the supporting documentation.

How effective was the DAS as a communication tool. The DAS was the focus for the responses of all consultees. Despite its containing some superfluous information, it did adequately convey the current best estimate of the developer as to what might be commercially possible, and established clear parameters in relation to scale and access. The responses of consultees (on file) show no evidence of their not understanding what was proposed. The architect/agent said that the DAS developed iteratively from numerous interactions with, amongst others, the marketing team of the developer and various commercial estate agents. It is reasonable to presume, then that it (or parts of it) were effective in

communicating with commercial audiences too. The access and equalities officer said that he always read the DAS when consulted on an application; however his direct involvement in this application appears to have been very limited.

How effective was the DAS as a mechanism to improve design and development quality

The architect said that the DAS went through numerous iterations, as a result of extensive pre-application discussions with – among others - planners, the marketing team, client team, and commercial property users in central Cardiff. It was also presented as part of the Design Review by the DCfW. It was certainly a vehicle for, and focus of, changes to design (which, we must presume, were improvements in at least some eyes). However, a development of this kind in this location, required a layout with enough detail to market the site and also enough for the planning authority and other consultees to gauge its wider implications. So it is very likely that something which was like this DAS in all essentials might have been produced anyway. DCfW said that the DAS was always central to their discussions with designers and developers, and would have been in this case. Among the least convincing parts of the DAS are those which appear to be acknowledgments of the advice in TAN 12 and elsewhere – namely, the rather casual treatment of crime and safety, and the descriptive, rather than analytical, approach to energy efficiency.

The DAS has not been formally up-dated as the site has been developed, but the layout plan has.

Key Findings

The requirement for a DAS in this case coincided with the need for a layout agreed by the planning authority and developer. The agreed layout, suitably justified and packaged, was a document which the lpa felt able to accept as a DAS. It appears to have been helpful for most consultees too.

The DAS showed no real engagement with principles of inclusive design beyond referring to Part M and to innovations in fitting out buildings. This lack of engagement had repercussions in a later application relating to the site, when the design of the footbridge

over the railway was unacceptable (ramp on one side; steps on the other side) which betrayed a failure to get to grips with first principles.

So, while the DAS was a useful tool in this case, it is questionable whether in itself it spurred architects to produce better design. The scrutiny by DCfW appears to have been more significant.

Infrastructure Development

Type of Application: full application for one stage of a peripheral distributor road. It is a revised design of a previously approved scheme that has been 'value-engineered'. It was an EIA development.

Date : Approved Feb 2011

Why was it selected : this was selected as an example of a major infrastructure project. These kinds of projects are typically subject to many regulatory regimes, can be geographically extensive and thus affect many interests, and can be less familiar to many of those asked to comment upon them (lpas, residents, etc..) than proposals for buildings of various kinds. A significant instance of this latter point is that most parties involved in considering proposals are likely to have had fewer occasions to think about design in relation to infrastructure proposals than they may have had in relation to other kinds of development. These characteristics raise questions about the role of DAS – there are reasons for expecting redundancy, but also possible opportunities for constructive use of DAS.

Overview of the DAS

The DAS presents a clear narrative about the policy rationale for the PDR and the key principles behind its alignment and design. There is quite an extensive account of participation, and an acknowledgement that the design has been sensitive to various concerns (including those of a disabled access group). The DAS refers regularly to the Environmental Statement and anyone wishing to question any of the design decisions would need to look at that document (many hundreds of pages long) and its supporting material rather than the 15 page DAS. The writing is clear, and

illustrations helpful. The DAS writer (who was part of the engineering design team and writing her first DAS) used WG and CABE documents, and looked at examples of DAS from large applications to the LPA, and that 'homework' is reflected in the document's focus. The writer of the DAS said that it was drawn up after extensive consultations rather than being used (in draft form) during them.

How effective was the DAS as a communication tool

Though reasonably well written, in practice it appears not to have been especially useful. The case officer did not refer to the DAS in his report nor in conditions (though he found DAS useful for large applications in general as summaries of key points). The community relations manager of the contractor for the project was unaware of the existence of the DAS. The apparent redundancy of the DAS may be because of special circumstances surrounding applications of this kind. First, an extensive Environmental Statement had been drawn up, with a summary, which covered much of the same ground. Secondly, the community relations efforts of the contractor followed a pattern which will be familiar to many large infrastructure projects – very regular stakeholder meetings, neighbour notifications of particular works by individual letter as necessary, public meetings. Unless use of DAS was already part of this kind of programme it would probably not find a role.

How effective was the DAS as a tool to improve design and development quality

The DAS was completed because it was needed to accompany the planning application. All key decisions had been discussed and agreed prior to its being written. It was approached as a stand-alone exercise by the design engineers.

Key findings

Major infrastructure projects appear to follow a well-understood and well-rehearsed programme of:

studies and consultations, both technical and non-technical, which feed into design decisions,

preparation of extensive documentation justifying those decisions

consultations and on-going communication during construction of the project

This makes preparing DAS as a stand-alone document quite straightforward, as everything needed is to hand. But it tends to make the DAS redundant. A major proviso, however, is that this case study was for road infrastructure, so issues of safety and inclusivity were central to functionality, and the engineers involved would have been well versed in them, with or without the need to prepare a DAS. The case study does not help us understand whether this would have been the case with other kinds of infrastructure.

Replacement Dwelling

Type of application - Replacement dwelling and new double garage

Date: submitted March 2010

Why it was selected – as an example of a single dwelling

Overview of the DAS - 2 pages, probably A3, landscape. Good mix of text, drawings and photos. Some evolution of design is given along with a clear design rationale for the project - "bespoke family home of contemporary design which seeks to distil many of the key features identifiable in vernacular Welsh regional buildings into a fresh and confident form that will sit comfortably in its village setting." And "...a rurally derived design approach." Whilst this DAS is short it still identifies and addresses nearly all of the relevant factors for the project and is completely site specific. It covers policy and physical context and a good analysis of the latter emerges. It provides a good description of character – amount, layout, scale, appearance. It mentions vehicular and internal access, but doesn't give a sense that considerations of access were an integral part of the design beyond the client's needs. It mentions pre-app consultation with neighbours and that the design takes account of views expressed without saying explicitly what those views were. (From the public representations and objections neighbour privacy and protected trees were of particular concern.) Two later sections are then devoted to how the design incorporates neighbour privacy

and protected trees which one can infer backs up this previous claim. It mentions two site constraints – protected trees and public sewer – and the solutions adopted to accommodate them. Environmental sustainability isn't directly addressed, but the protected trees are addressed, there's a mention of provision of generous SW elevation glazing and passive solar heat gain, and there's a mention of permeable paving to drive and an oblique reference to 'lifetime homes' idea, under access. Community safety isn't addressed although there is a mention of external lighting probably for the purpose of addressing another neighbour concern. Renderings of the proposed dwelling are superimposed onto photos of the street context from different angles to give a useful impression of what the finished scheme will look like. The DAS was not referred to in committee report or decision.

How effective was the DAS as a communication tool

The DAS provides a good explanation of the design process and a good justification of the design outcome. Planning officer said she definitely found the DAS useful. She said as this was a modern building the DAS helped to explain the scheme and the themes behind the design. This made her more sympathetic towards it. However, she didn't refer to it in her committee report because she said it wasn't necessary, but also because she "wanted to appear more neutral" implying that the information, or some of the information, in the DAS, or her view of this, was impartial/biased/subjective rather than factual. Some of the public objectors to this project also used a claim of favourable image distortion in the DAS to substantiate their objections.

The Tree Officer said in interview that he read the DAS and its photos were useful for getting a picture of the protected trees in relation to the proposed new dwelling, but he didn't refer directly to the DAS in his comments.

The DAS provided an opportunity for the architect to explain how the design addressed neighbour concerns. There were nine letters of objection from neighbours to this application. A few of these directly or indirectly referred to the DAS with regard to the architect's explanation of how the design addressed neighbour privacy, and thus enabled objectors to make effective representation on this

aspect of the proposal. However, none of these representations was particularly substantial and consequently none resulted in design amendments during the planning process.

How effective was the DAS as a mechanism to improve design and development quality

This was a favourable site with an enlightened client and a decent budget who chose a good architect. It was most likely this combination that produced a well designed contemporary home rather than the DAS, which probably had no affect on the design at all. Asked what he saw as the function of the DAS in this case the architect said “we view them as a valuable opportunity to communicate our design ideas”.

Key Findings

The DAS can be useful for explaining to neighbours how their concerns are addressed in the design, and for them in turn to use this information to respond. The DAS format helps to break down the technical communication barriers between architects and lay people.

Some architects enjoy communicating their design ideas to others and value the opportunity to do so. The DAS gives them a place to do this.

Photos and illustrative material in a DAS can be of use in giving a picture of what’s proposed and this part of a DAS’s content should not be overlooked.

There is a fine line between informing and influencing in the provision of information in a DAS. Where a DAS is particularly strong on design rationale there is a risk of it being interpreted as the latter, even where this was not the obvious intention of the writer. The DAS can then be viewed as more of a marketing document than a design document in the eyes of some or all of its audience, which can undermine its credibility.

In a situation where an enlightened client with a decent budget engages a good architect the existence or not of a DAS requirement probably makes little difference to the quality of the finished design.

A comment by the architect – “We feel that higher standards are often required of architects by the planners with regard to DAS content than are required of non-architects, and this is unfair.”

Small Scale Development (no floor space)

Type of application - Installation of a tourist information totem machine

Date – planning permission granted October 2010

Why it was selected – as an example of a very small project

Overview of the DAS – Nine pages, A4, portrait, text only, with not much on each page – probably three pages of text in all, no drawings/images of the totem and its site. However, it does contain two references to drawings/images submitted with the planning application.

It contains almost all of the TAN 12 headings regardless of whether they are relevant to the project but this is partly because the LPA insist on some of these headings. However, what little information is included under most of the headings falls into two categories. Firstly, generalisations that are not terribly informative or site specific e.g. under “Movement and Access” it says “The current facility is accessed on foot, bicycle or car off [...] Street”. And secondly, endless negative statements about what the totem will not impact upon because it is so small, such as the: “physical context of the area”; “character of the existing site”; “local environment”; “existing landscape”; “water consumption”; “climate resilience”; “existing entrance points”; “circulating routes”. Consequently whilst something is said about the project under each TAN 12 heading what is actually said is not particularly relevant. Under Access it says there is level access to the totem from the existing seating area. However, this seating area is only 2m from it and there is no mention of level access onto the seating area or via dropped kerbs from across the road or from the nearest bus stop or car park etc for tourists/visitors to access it. A list of local policies and national guidance is reproduced unnecessarily.

The following information might have been worth including but wasn't:

As part of justification - from interview it was discovered that the tourist board had conducted a survey in the village to determine where best to site the totem. This could have been usefully mentioned in the DAS as justification for the choice of site as no justification for this was given.

Under access - there is no indication as to whether the totem is sited in direct sunlight or shade which may affect the legibility of its screen particularly for partially sighted. There is no mention of its proximity to car parking and public transport stops for its potential visitor/tourist users. However, interviews with the shop owner next door and client confirm that it is very close to bus stops and easy street parking. There is no mention of signposting to it as the totem is sited in a side street. Again, interview with the shop owner confirms that a signpost to it was erected on the main road shortly after its installation. However, he thinks this sign is too small as visitors/tourists often miss it and have to stop and ask for directions to it, instead.

Under appearance - the agent admitted to not knowing that the totem would be as brightly lit at night as it is and so this information was not in the DAS. He thought it would have been useful to have included this.

The totem itself was designed and installed by a supplier. The planning application and DAS were prepared by an architectural agent. The agent said in interview that he'd had no direct contact with the supplier. His client – the local tourist board - had provided him with the information he'd used to prepare the application and DAS. The DAS reads as if the writer has insufficient knowledge of the project and its site and consequently has struggled for content.

How effective was the DAS as a communication tool

The DAS provides no design evolution or design rationale. A general justification for the project is given as improving tourism in the area, but no site specific justification is given for the choice of this particular site or this particular village. There are no images of the site or totem in the DAS so it's impossible to get a visual picture of

the proposal from the DAS. The planning case officer said the DAS helped her to understand the purpose of a totem as she hadn't dealt with a totem application before, but she didn't think it was a very good DAS, and it wasn't referred to in committee report. There were no consultees, and no comments or objections received.

How effective was the DAS as a mechanism to improve design and development quality

The DAS was prepared by an agent after all the design decisions had been made by others. The tourist board client didn't read the DAS. The agent viewed the purpose of the DAS as "necessary to get the planning application registered". The agent relied on partial information only to prepare the DAS and obviously lacked sufficient site context information. Despite the agent seeking pre-application advice from planning department on what to include in the DAS, the planning application still failed registration initially because the DAS did not contain physical, social, economic and policy context headings. Apparently the LPA always require these even if n/a is written under each. Registration was dealt with by a registration administrator not a planning officer. The required sections were subsequently inserted, with policies unnecessarily reproduced in full, but their choice of content added little of value to the DAS, and had no effect on the final design particularly as the writer wasn't the designer.

Key Findings

Whilst the DAS lacked useful information particularly on site justification and access, from interviews with the client and a user it emerged that both of these factors had been considered reasonably well in the design. Given that the client was a tourist board, in an age of ever increasing 'sensitivity to the customer', this finding is not very surprising. Therefore, given that there was little in the DAS of use, abandoning DAS requirements for this type of application might not pose too much of a risk to design quality.

Notwithstanding the suggestion above, this case also highlights that where very small projects are for the use of the general public site justification and access to the development are important design considerations. Perhaps, alternatively, whether a DAS type

requirement is necessary for very small projects might also be linked to whom the intended (and unintended) users of a scheme are.

This case highlights yet again that what the DAS writer actually decides to include in a DAS can be pretty arbitrary. So often there is a lot more or a lot less that could have been included i.e. deemed relevant under any of the TAN 12 headings for any particular project. At what point does the 'choice' of content rather than the 'lack' of content render a DAS insufficient? When the planning department view the DAS as a tick box exercise then surely it's more likely that an application will be refused registration on the basis of the latter rather than the former. This discretionary content factor that is often deemed unfair by applicants undermines respect for DAS. A DAS has no clear 'pass mark'.