

**Residential Design Standards Supplementary Planning
Document (SPD)**

Statement of Compliance and Sustainability Statement

August 2008

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1. Introduction

What is the Residential Design Standards Supplementary Planning Document (SPD)?

This SPD sets out the standard of design expected from residential development. This will help ensure that all residential development creates high quality and accessible homes, and not does have a negative impact on the surrounding environment. It includes standards on wheelchair housing, outdoor amenity space, minimum floor areas, and privacy.

What is the Residential Design Standards SPD Statement of Compliance and Sustainability Statement?

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

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

Where to get more information?

You can download a copy of the SPD and supporting documents from:
<http://www.southwark.gov.uk/YourServices/planningandbuildingcontrol/planningpolicy/rdsspd.html>

Copies are also available by contacting the Planning Policy Team:
Regeneration department, Southwark Council, Chiltern House, Portland Street, London, SE17 2ES. Email: planningpolicy@southwark.gov.uk or telephone 020 7525 5471

2. Statement of compliance

What were the stages of consultation?

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

Requirement of SCI (for SPDs)	When did it occur?
Consult on SA/SEA Scoping Report (5 weeks)	25 June to 30 July 2007
Prepare Consultation Plan	June 2007
6 week informal consultation on draft SPD and SA/SEA Report	28 September 2007 – 7 January 2008
6 week formal consultation on draft	8 January – 19 February 2008

SPD and SA/SEA Report	
Prepare Consultation Statement	July 2008

Who was consulted and how?

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

	Stage in consultation	Sustainability Appraisal and the Scoping Report	Draft SPD
Statutory	Mailout to statutory consultees	Natural England, English Heritage and the Environment Agency all written to 25 June 2007 for the scoping report and 7 January 2008 for the main Sustainability Appraisal and draft SPD.	7 January 2008 to all consultees on planning policy's mailing list. See appendix 1 and 3.
	Displaying documents at council offices	Not a statutory requirement	SPD, EQIA and SA report all distributed to libraries, council offices, Town Hall, One Stops shops, Housing Offices. See appendix 2
	Advertisement in local press	Not a statutory requirement	Advertisement detailing the consultation was put in the South London Press on 11 January 2008. See appendix 2
	Putting document on council website	25 June 2007– scoping report put on website. 28 September 2008 – SA Report put on website	28 September 2008 – SPD and supporting documents put on the council website. 7 January 2008 – updated SPD and supporting documents put on the website

<p>Additional consultation in accordance with the SCI</p>	<p>Presentations to Community Councils</p>	<p>Not a requirement</p>	<p>All community councils were offered a presentation and stall on the SPD. We attended the following: Rotherhithe – 30 October 2007, Camberwell – 30 October 2007 and 5 February 2008, Walworth – 7 November 2007, Nunhead and Peckham Rye – 7 November 2007, Borough and Bankside – 28 November 2007 and 16 January 2008, Dulwich – 28 January 2008, Peckham 5 March 2008</p>
	<p>Presentations to Area Housing Forums</p>	<p>Not a requirement</p>	<p>All area housing forums offered a presentation. We attended the following: Bermondsey West – 23 October 2007, Bermondsey East – 24 October 2007, Walworth West – 25 October 2007, Camberwell West – 6 November, Camberwell East – 12 November 2007, Bankside and Borough – 13 November and 11 December 2007 and 15 January 2008, Walworth Central – 11 December 2007, Walworth East – 13 December 2007,</p>

	Presentation to Disability Forum	Not a requirement	14 November 2007
	Presentation to Equalities and Diversity Panel	Not a requirement	17 July 2007
	Translation of documents supplied	Not request	One request was received for an audio version of the document. This was sent out in January 2008.
	Consultation comments and officer responses made available	Posted on the website 28 July 2008. All parties submitted representations were written to/emailed on 25 July 2008 advising that the revised SPD and officer comments on the representations were available on the website. These parties were invited to comment on the accuracy of our interpretation of their comments. Also advised of Planning Committee and Executive dates.	Posted on the website 28 July 2008. All parties submitted representations were written to/emailed on 25 July 2008 advising that the revised SPD and officer comments on the representations were available on the website. These parties were invited to comment on the accuracy of our interpretation of their comments. Also advised of Planning Committee and Executive dates.
	Follow up letter to be sent to all parties who submitted representations advising of decision to adopt.	This will be done following the Executive decision on 23 September 2008	This will be done following the Executive decision on 23 September 2008

3. Summary of issues raised

22 groups or individuals made representations on the draft SPD. This totalled 118 representations, of which 8 were supporting and 110 were objecting to the draft SPD. The main issues of objection were:

- Objections to the whole document and that we should not be setting any standards.

- Objections to density standards
- Objections to the percentages of family housing we require
- Design standards for developments to be allowed to exceed 700 habitable rooms per hectare in Public Transport Accessibility Zones. Most of the objections were on the requirement for dual aspect, natural light and ventilation, exceeding amenity spaces and minimum floor areas, daylight/sunlight requirements and being flexible and adaptable.
- Minimum floor areas. Standards too onerous and should not be in the SPD for market housing
- Minimum room heights too high
- Objections to setting out requirements that should be applied to the internal layout of dwellings
- Daylight and sunlight requirements. Standards too prescriptive. Use of BRE and Code for Sustainable Homes is confusing.
- Privacy and security. Objections to the distances required between buildings
- Lifetime Homes standards are too onerous
- Amenity space requirements being too much and too prescriptive
- Requirements for children's play areas being too big and should not be in SPD. Also representations on that if is in the SPD, we should use different child yields.
- Student housing – objections on the room sizes and standards, and the use of public transport accessibility levels to determine where student housing will be permitted.

4. Summary of officer comments

A full table of officer comments on each representation is provided in as a further appendix to the committee report and is available on our website. The main changes arising from the representations are:

- Making the requirements for higher density be that development "should" rather than that they "must" meet the list of requirements. As part of this changes were made to say that there should be a predominance of dual aspect (rather than a minimum of 60%), have good daylight and sunlight, and removed being flexible and adaptable
- Minimum floor area table changed to be more clear on what we require.
- Minimum room height amended to be in accordance with Building Regulations
- Section on dwelling mix changed to make it clearer and to just refer to existing policy in the Southwark Plan
- Daylight/sunlight section changed to read that developments "should" meet these standards rather than that that "must". Section also rewritten to make it more clear.
- Removed section on Code for Sustainable Homes
- Amended the child yields for play areas to be the same as those used in our adopted Section 106 SPD.
- Removed section on design requirements for student housing

We also wrote to all parties who commented on the SPD to check the clarity of our interpretation of their representation. We received comments from three parties in response to this letter. We have made minor amendments to the table of officer comments as a result of this. Both tables can be viewed on the website.

5. Summary of Sustainability Appraisal Methodology

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

How have sustainability concerns been part of the preparation of this SPD?

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

Stage in sustainability appraisal	When did it occur?	Related SPD Stage
<p>Stage A: This involved:</p> <ul style="list-style-type: none"> – reviewing related plans and programmes; – collecting information to describe the borough as it is now and identify how it may change in the future; and – deciding on the key sustainability issues that the appraisal will focus on. <p>It included the preparation of a scoping report that highlighted the key issues being considered early on in the SPD process and explained how the plan would be appraised.</p>	<p>This stage began in April 2007.</p> <p>Consultation on the scoping report began on 25 June 2007. Comment was sought from the Environment Agency, the Countryside Agency, English Nature and English Heritage.</p>	<p>Pre-production and evidence gathering</p>
<p>Stage B: This involved testing the likely impacts of the SPD on the environmental, economic and social issues set out in the scoping report. Usually there are a few different approaches that could be taken to guiding development. These are called options. The likely impacts of</p>	<p>This took place in July to August 2007.</p>	<p>Preparing and refining draft SPD</p>

different options were tested and compared.		
Stage C: This involved preparing a Sustainability Report, which sets out the process taken to appraise the SPD and the findings of this appraisal. The report is considered by councillors when they agree the draft SPD for consultation.	This was completed in September 2007	Finalising the draft SPD and getting councillor agreement to consult on the draft.
Stage D: This involved consulting on the sustainability report. It is also provided for comment by the public with the SPD.	Consultation on the Sustainability Report took place between 28 September 2007 and 19 February 2008. All members of the public were invited to comment.	Consultation on the draft SPD.
<p>Stage E: This stage involves considering comments made during the consultation stage and making final amendments to the draft SPD. Any significant changes to the SPD will need to be appraised.</p> <p>This reports sets out how the public's comments have been dealt with and identifying what difference the appraisal process has made.</p> <p>Once the plan has been agreed (adopted), its social, economic and environmental impacts will then be monitored through the council's annual monitoring report.</p>	<p>Consideration of representations took place in May to July 2008.</p> <p>A criteria of enhancing and preserving the setting of heritage assets has been added into the section on conservation of the historic environment. This is set out in appendix 4 of officers comments.</p> <p>Monitoring of the SPD will take place once it has been adopted in September 2008.</p>	<p>Considering outcomes of consultation.</p> <p>Considering outcomes of consultation.</p> <p>Adoption and monitoring of final version of the draft SPD.</p>

6. How has the document changed as a result of the Sustainability Appraisal process?

The sustainability appraisal process has been an important companion to the plan making process. It has fed into each stage of the preparation of the draft

SPD, initially helping to identify the issues that the draft SPD needs to respond to.

How has the consultation influenced the preparation of the document?

The sustainability appraisal scoping report was comments were received from all three of the statutory consultees. These comments and our responses to these comments, including how we have modified the SPD and sustainability appraisal as a result, are set out in the Sustainability Report.

How has the Sustainability Report been taken into account?

The Sustainability Report concluded that the SPD would have only positive impacts on the sustainability objectives. However, for a few of the sustainability objectives, it was identified that the SPD may have an uncertain or only a very minor impact. This was the case for employment opportunities, air quality and reducing waste. These issues are all covered in other supplementary planning documents, and there is no change made to the draft SPD to make more of a positive impact on these as it is too much for the SPD to attempt to cover.

What options were considered in the preparation of the draft SPD?

Two options for the draft SPD were identified and appraised. We compared the likely effects of each of these options. The two options were:

- Option A – Minimum design standards

The SPD to set out minimum design requirements for certain aspects of residential dwellings including minimum floor areas, daylight and sunlight requirements, amenity space and wheelchair standards. Applicants will need to meet these standards in order for planning permission to be granted unless they can justify why a certain standard cannot be met.

- Option B – Best practice standards

The SPD to set out best practice guidance for residential dwellings. The best practice would include recommended guidelines for aspects of residential dwellings such as desirable floor areas and desirable amenity space requirements. Applicants would be advised to meet the best practice guidance but planning applications would not necessarily be refused if the recommended guidelines were not met.

Option A forms the basis of the version of the SPD that is recommended for adoption. This is because:

- It is the most sustainable option as demonstrated through the sustainability appraisal as it has a stronger positive impact than option B on the majority of the sustainability objectives.
- Setting minimum design standards makes the SPD clearer than if it only sets best practice standards.
- Applicants will be able to clearly see the minimum standards that they must meet for an application to be granted planning permission.
- It also makes it easier for development control officers to be clear in what they expect in the residential development and to demand a higher quality in the design of dwellings.

- A SPD which includes minimum design standards will have a greater impact on improving the residential development than option B.

7. How will the SPD be monitored?

Monitoring allows the council to identify if planning policy is having the intended outcomes and impacts. This SPD will be monitored through the Local Development Framework Annual Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of the council's planning policy and guidance and what effects this development is having in terms of sustainability. In particular the following AMR indicators will monitor the SPD: density of new residential, size of dwellings and amount of new development that meets Lifetime Homes standards

Appendix 1: List of statutory consultees

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

Organisation
National Disability Council Secretariat
National Grid
Network Rail
Port of London Authority
Southwark Friends of the Earth
Southwark Police
Sport England - London Region

Appendix 2: Copy of advertisement

NOTICE OF FORMAL CONSULTATION ON THE DRAFT SUPPLEMENTARY PLANNING DOCUMENTS (SPD) ON RESIDENTIAL DESIGN STANDARDS AND TRANSPORT PLANNING FOR SUSTAINABLE DEVELOPMENT

Planning and Compulsory Purchase Act 2004

The purpose of the draft supplementary planning document (SPD) on Residential Design Standards is to set out what standard of design is expected from residential development. This will help to make sure that all residential developments create high quality and accessible homes, and that they do not have a negative impact on the surrounding area. It includes guidance and standards on wheelchair housing, minimum room sizes, outdoor amenity space and privacy. The SPD covers the entire borough of Southwark.

The Transport Planning for Sustainable Development SPD provides guidance on how developments can encourage more sustainable modes of travel, such as walking and cycling and reduce people's reliance on cars. This will help to reduce congestion and pollution and improve the environment. The SPD includes guidance on the type of transport information we need to make decisions on planning applications such as car parking standards, travel plans and transport assessments. The SPD covers the entire borough of Southwark.

Once adopted both of the SPDs will be material considerations in assessing planning applications in Southwark.

The draft SPDs and supporting documents (including Equalities Impact Assessment and Sustainability Appraisal) are available for formal public consultation from Tuesday 8th January 2008.

How to Comment

If you would like to make comments on the draft SPDs, you can do so by filling in a representations form and sending it by post to Freepost SE1919/14, Planning Policy, Southwark Council, Chiltern House, Portland Street, SE17 2ES or by e-mail to: planningpolicy@southwark.gov.uk

Representation forms and guidance notes on how to make comments are available free of charge from the locations listed below.

If you make a representation the council will keep you updated on the progress of the SPD and let you know in advance when we intend to adopt it.

Deadline for Submitting Comments

All representations must be submitted to the council by 5pm on Tuesday 19th February 2008.

Where to view the Draft SPD and get copies of Representations Forms

The draft SPDs and supporting documents (including Equalities Impact Assessment and Sustainability Appraisal) are available to view at the locations listed below from 8th January 2008.

You can request copies of the draft SPDs, supporting documents and representation forms from the planning policy team on 020 7525 5471 (between 9am to 5pm, Monday to Friday) or email: planningpolicy@southwark.gov.uk.

Website (Available 24 Hours / 7 Days a Week)

Residential Design Standards SPD:

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

Transport Planning for Sustainable Development SPD:

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

Council Offices (Opening times 9am - 5pm Monday - Friday)

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

Libraries (Opening Times Listed Individually Below)

- Blue Anchor Library - Market Place, Southwark Park Road, SE16 3UQ
(Monday, Tuesday and Thursday 9am to 7pm, Friday 10am to 6pm, Saturday 9am to 5pm)
- Brandon Library - Maddock Way, Cooks Road, SE17 3NH
(Monday 10am to 6pm, Tuesday and Thursday 10am to 7pm, Saturday 10am to 5pm)
- Camberwell Library - 17-21 Camberwell Church Street, SE5 8TR
(Monday, Tuesday and Thursday 9am to 8pm, Friday 10am to 6pm, Saturday 9am to 5pm)
- Dulwich Library - 368 Lordship Lane, SE22 8NB
(Monday, Thursday and Friday 9am to 8pm, Tuesday 10am to 8pm, Saturday 9am to 5pm, Sunday 12pm to 4pm)
- East Street Library - 168-170 Old Kent Road, SE1 5TY
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)
- Grove Vale Library - 25-27 Grove Vale, SE22 8EQ
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)
- John Harvard Library - 211 Borough High Street, SE1 1JA
(Monday, Tuesday and Thursday 10am to 7pm, Wednesday and Friday 10am to 6pm, Saturday 10am to 2pm)
- Kingswood Library - Seeley Drive, SE21 8QR
(Monday and Thursday 10am to 2pm, Tuesday and Friday 2pm to 6pm, Saturday 1pm to 5pm)
- Newington Library - 155-157 Walworth Road, SE17 1RS
(Monday, Tuesday and Friday 9am to 8pm, Thursday 10am to 8pm, Saturday 9am to 5pm, Sunday 10am to 2pm)
- Nunhead Library - Gordon Road, SE15 3RW
(Monday, Tuesday and Thursday 10am to 7pm, Friday 10am to 6pm, Saturday 10am to 5pm)
- Peckham Library - 122 Peckham Hill Street, SE15 5JR
(Monday, Tuesday, Thursday and Friday 9am to 8pm, Wednesday 10am to 8pm, Saturday 10am to 5pm, Sunday 12pm to 4pm)
- Rotherhithe Library - Albion Street, SE16 7HY
(Monday and Thursday 10am to 7pm, Tuesday 10am to 6pm, Saturday 10am to 5pm)
- **Area Housing Offices (Open 9am - 5pm Monday - Friday)**
 - Nunhead and Peckham Rye - 27 Bournemouth Road, Peckham SE15 4UJ
 - Dulwich - 41-43 East Dulwich Road, SE22 9BY
 - Borough and Bankside - Library Street Borough, London SE1 0RG
 - Camberwell - Harris Street, London SE5 7RX
 - Rotherhithe - 153-159 Abbeyfield Road, Rotherhithe SE16 2LS
- **One Stop Shops (Open 9am - 5pm Monday - Friday)**
 - Peckham One Stop Shop - 122 Peckham Hill Street, London, SE15 5JR
 - Walworth One Stop Shop - 151 Walworth Road, London SE17 1RY
 - Bermondsey One Stop Shop - 17 Spa Road, London SE16

Appendix 3: Local consultees

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

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

