

Design Guide Supplementary Planning Document

Part 1 - Design Principles

Statutory Consultation Report

January 2025

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This report summarises the consultation and engagement undertaken in relation to the Design Guide Supplementary Planning Document (SPD) Part 1: Design Principles being prepared by the London Borough of Bexley.

The Design Guide SPD Part 1: Design Principles is the first in a set of new SPDs that the Council is preparing to support the adopted Bexley Local Plan.

The Design Guide SPD Part 1: Design Principles will provide more detailed guidance setting out how the relevant policies in the Bexley Local Plan and London Plan should be applied across the borough to ensure development is coordinated and reinforces the local distinctiveness of Bexley while discouraging generic development that does not complement its context.

This new SPD is intended to aid the planning process and is applicable to all new development across the borough. The guidance is anticipated to be primarily used by people in local communities and their representatives to assess proposals; applicants and their design teams in the preparation of planning applications; and decision-makers when considering new planning applications.

The production of the Design Guide SPD Part 1: Design Principles has been informed by a local evidence base and shaped through engagement with stakeholders and the statutory consultation process. The statutory consultation period took place over an eight week period during summer 2024.

The purpose of this report is to summarise the engagement methods used in the consultation, including those who were consulted and the key findings and takeaways from the consultation.

Consultation and Engagement Summary

The approach to consultation was developed to conform with the Council’s Statement of Community Involvement (SCI) (2019).

The overarching aim of the consultation was to provide an opportunity for both internal and external stakeholders to comment on the design opportunities and issues that the Design Guide SPD should address. These objectives are outlined in Fig. 01.

The consultation process was designed to ensure broad and inclusive community engagement. This section details the various consultation and engagement methods used throughout both production of the Design Guide SPD and during the statutory consultation period. Fig. 02 provides an overview of the development stages that accompanied these consultation activities.

Stage 1

Initially, Officers determined the scope, objectives and proposed content of the Design Principles document. This was done through evidence gathering in the borough, with officers conducting site visits to gain a more holistic understanding of the development opportunities and challenges across Bexley.

During this stage, consultation and engagement largely comprised of both in-person and online meetings and workshops with Steering and Working Groups made up of Officers from across the Place directorate.

Consultees were engaged at various key stages on sections of the document relevant to their expertise.

Workshops were held on key topics highlighted through evidence gathering to determine the importance of including guidance addressing these topics, with insights provided by Officers on design opportunities and issues frequently arising in planning applications.

Ideas and issues arising during Working Group

Fig.01 Design Guide SPD Consultation Objectives

Key objectives

- To establish a deeper understanding of the key local design issues and opportunities that the Design Guide SPD Part 1 - Design Principles aims to address.
- To seek internal and external stakeholder views on the proposed objectives, themes and topics of the Design Guide SPD Part 1 - Design Principles.
- Reach a broad and diverse audience through a variety of engagement methods and encourage comprehensive comments and feedback.
- Ensure that those who might be directly affected by the guidance are informed and have their opinions heard, recorded and considered, meeting the requirements of the Council’s Statement of Community Involvement (SCI).
- Identify successful aspects of the consultation strategy and where lessons could be learned and how to implement these for future engagement and consultation.

Fig.02 Design Guide SPD Consultation Stages

| Preparation Stage | Purpose | How stakeholders were consulted |
|---|---|--|
| Stage 1 Evidence gathering and initial consultation (2022 - 2023) | The focus of this stage was evidence base gathering and site visits, followed by an initial consultation with internal stakeholders. This was intended to alert all stakeholders to the project’s aims and to determine key issues for inclusion within the guidance document. | Quarterly meetings with Officers Steering Group, with representation by Officers across relevant departments; Officer working groups at workshops and pre-consultation meetings; Senior Officer briefings; Cabinet Member and Local Councillor attendance at workshops, pre-consultation meetings and briefings. |
| Stage 2 Statutory consultation (July - September 2024) | During this stage, the draft SPD was published for review, with feedback sought to determine its suitability for its purpose | The draft SPD was made available online alongside a survey; physical copies were also available in libraries across the Borough and at the Civic Centre reception; three in-person, drop-in events were hosted at libraries across Bexley |
| Stage 3 Adoption of SPD (September 2024 - January 2025) | This stage focused on reviewing and considering the representations made during the Statutory Consultation before making necessary updates to the document and deciding on the adoption of the guidance. | Briefing to Heads of Service across all Council directorates, Corporate Leadership Team and Public Cabinet. |

meetings were further discussed during Steering Group meetings.

Members were invited to attend an initial Briefing Workshop with the Placemaking team to establish exactly what the guidance should comprise of and what contents would be required to achieve the aim of good design across the Borough. Alongside those raised by Officers, the themes brought by Members formed a basis for those addressed by the guidance.

Members received outline updates of the guidance during development, presenting an opportunity for further Member input and comment on certain issues.

A working draft document was presented to Members in March 2024, outlining how the Design Guide SPD had evolved since initial workshops with Members.

Further details of the consultation that took place can be found in Appendix A as the Statement of Consultation that accompanied the Public Consultation Draft Design Guide SPD.

Stage 2

The statutory consultation period ran from 22 July to 13 September 2024. During this time, a copy of Design Guide SPD Part 1 - Design Principles was made available at all 13 libraries across the borough and one copy was left at the Bexley Civic Offices reception for the duration of the consultation period. In the run up to, and during this time, the below methods were employed.

Letter and email outreach

When the statutory consultation period opened, letters were posted out and emails sent out to over 1000 individuals, businesses, applicants and agents on the Bexley Strategic Planning database, informing them of the consultation and encouraging them to review the Design Guide SPD and return comments.

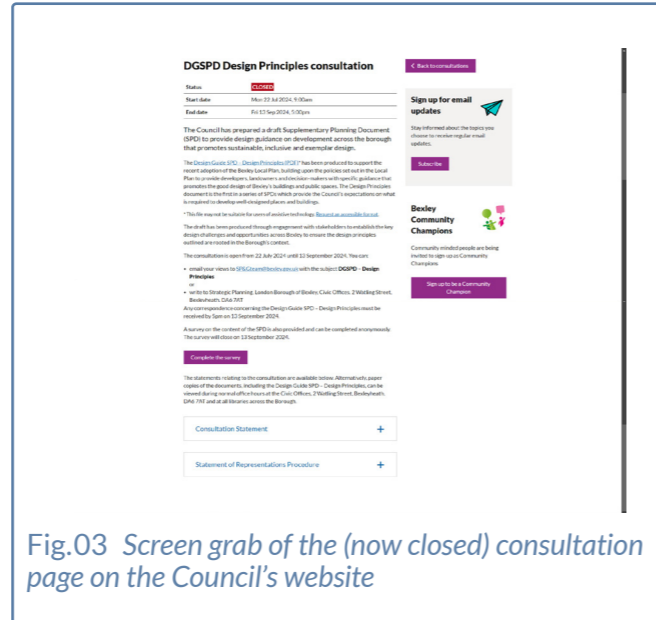


Fig.03 Screen grab of the (now closed) consultation page on the Council's website

Online presence

The Council Communications Team publicised the consultation period and related in-person events via social media channel X. The Council's Economic Development team also shared this information via their Bexley Business and Employment newsletter and social media channels.

A webpage was set up using the Council's Consultations webpage. The page contained an explanation of the SPD, the draft SPD to download, and details of how to respond to the consultation via email and letter. Alongside this, a link to an online survey was provided. The survey aimed to assess the effectiveness and clarity of the document in guiding development in the Borough and to identify any missed issues or areas for improvement in achieving the objectives set out by the document.

Eight responses were recorded via the survey.

Drop-in events

Three drop-in events were hosted at Bexleyheath Central, Erith and Sidcup Libraries in August 2024. These locations were chosen to ensure accessibility across the Borough.

Posters were provided to each library hosting an in-person consultation event and displayed in the run up to these events, announcing the upcoming drop-in consultation sessions.

The events provided an opportunity for face-to-face engagement between Council Officers and the wider public. Those that attended the event included local residents and representatives of local groups such as the Bexley Civic Society.

During these events, two A1 boards (see Fig. 05 overleaf) were displayed with details of the Design Guide SPD, setting out the document's objectives, themes and topics and paper copies of the online survey were made available (Fig. 04 opposite). Officers were present to answer attendee queries

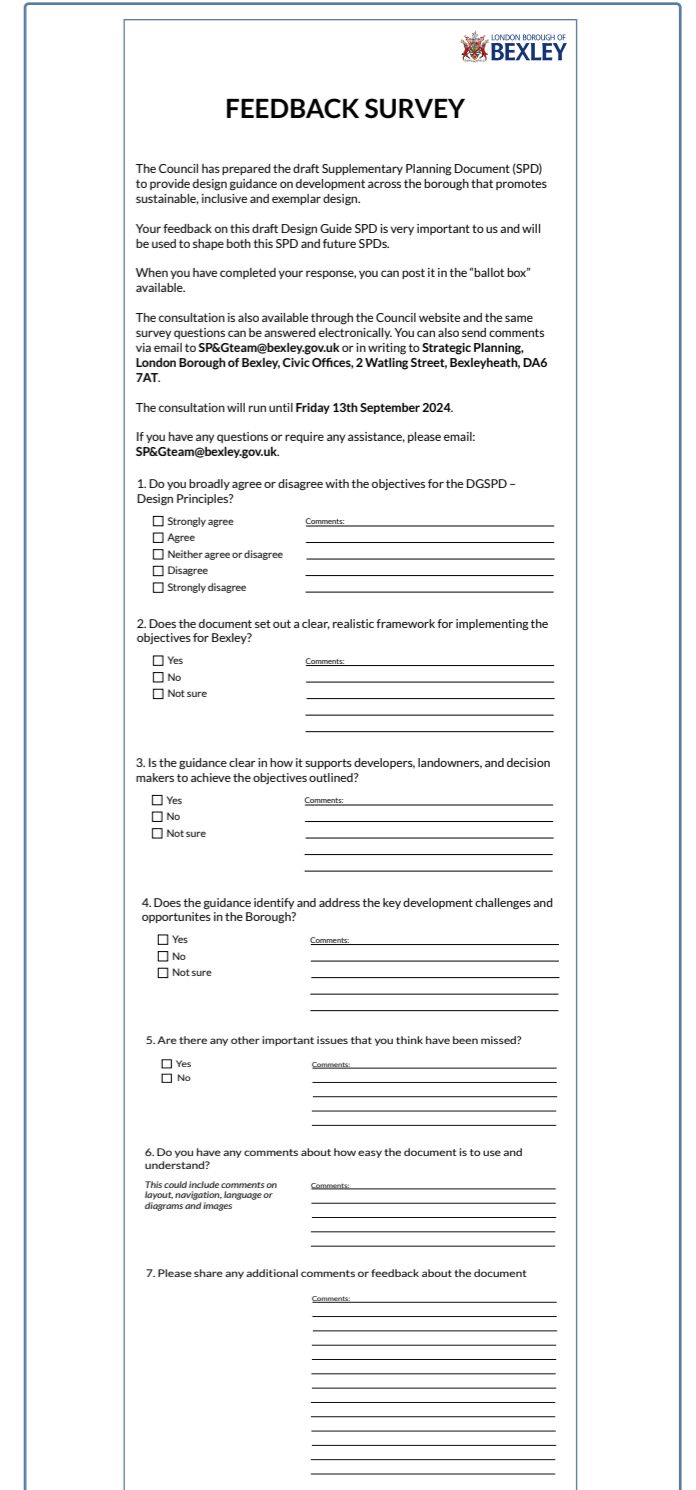


Fig.04 The survey provided for attendees at the drop-in events. This featured the same questions as those asked in the online survey.

and attendees were encouraged to fill out the survey in person or return comments via post or email.

Stage 3

A final draft of the Design Guide SPD has been prepared for adoption. It has been informed by the consideration of comments received from the public consultation (see next section - Statutory consultation responses for further detail).

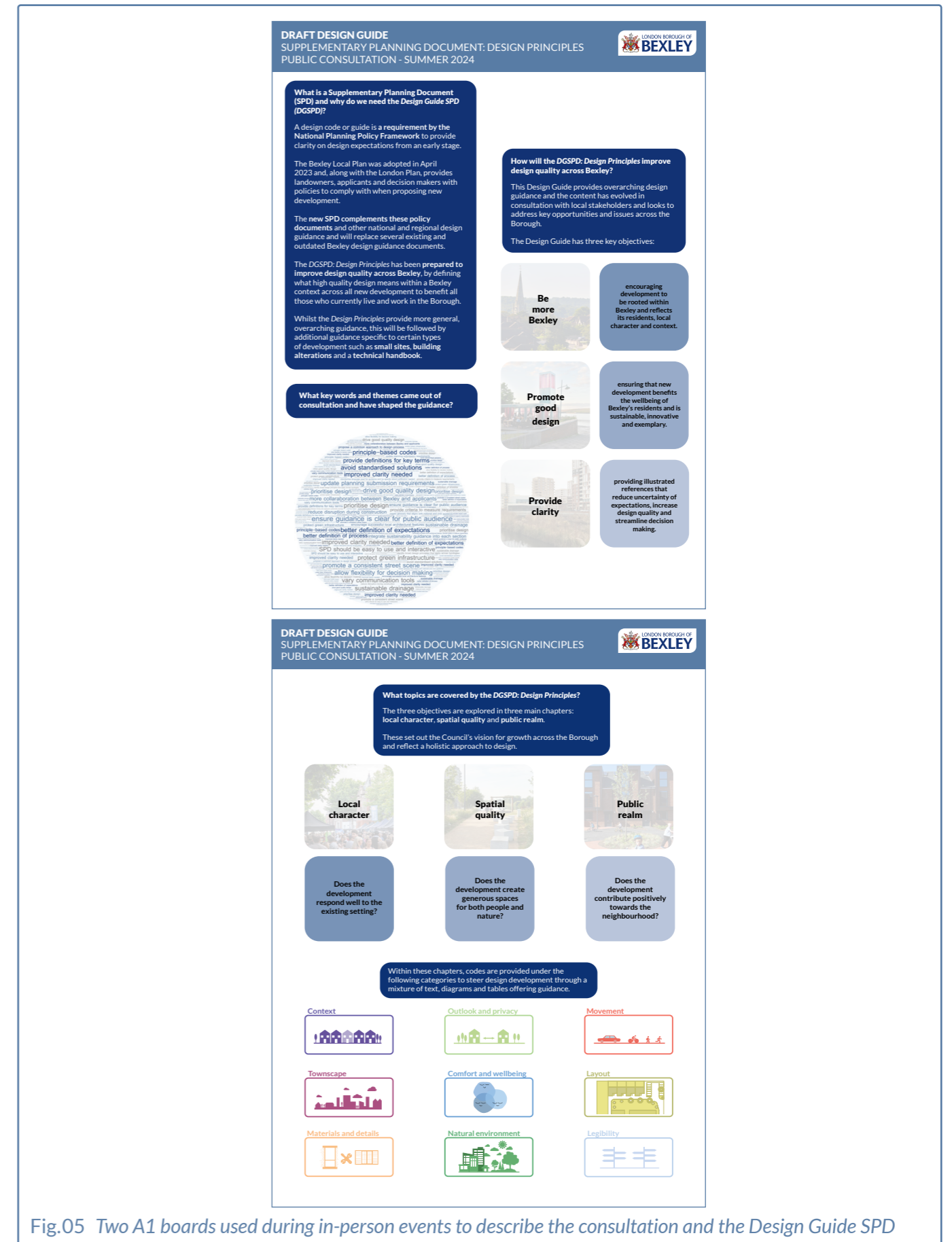


Fig.05 Two A1 boards used during in-person events to describe the consultation and the Design Guide SPD

Statutory Consultation Responses

The following summarises the feedback received through consultation. This includes representations and comments submitted which have been used to finalise the SPD.

During the statutory consultation period, eight responses were received via the online survey and 20 written representations were received, including responses from statutory consultees at the Environment Agency, the Greater London Authority, the Metropolitan Police, National Highways, Port of London Authority, TfL and Thames Water.

Each representation received was logged and reviewed by the Council. The following summary of comments includes the Council's response to them and is organised by code within the Design Guide SPD Part 1 - Design Principles document. The summary also includes some miscellaneous comments that did not pertain to any particular code.

In some instances, comments received were deemed too specific for inclusion with the overarching guidance provided in the Design Guide SPD Part 1. These representations have been compiled within a tracker and will be referred to and included in the more specific guidance documents comprising the Design Guide SPD Part 2.

Written responses (received via e-mail)

D 01

Two main points are highlighted in the comments received on D 01 - the first regarding removing greenery and planting to front gardens to accommodate parking. This is addressed later in the document in D32 (3.80) and will be further addressed in the emerging Building Alterations and Extensions document in Part 2 of the Design Guide SPD. As Bexley has a number of main rivers running through it, the Environment Agency's suggestion to make reference to these rivers and flood defences was incorporated into D 01 when covering Bexley's ecological features and physical

barriers.

D 02

Two representations requested more information being made available to applicants to explain the Design Review process. This is available via the LBB website under 'Planning Policy and Guidance' and a hyperlink to this has been added to the document. One representation raised concerns that modern design would always be deemed to be suitable, if the "contemporary translation" strategic approach is adopted. However the SPD sets out the approach required of applicants to ensure their development proposal is appropriate to its immediate and local context, especially in sensitive contexts such as Conservation Areas.

D 03

Representations suggested adding further detail to make the guidance more robust, and where appropriate, modifications have been made to the guidance. Further policy context has also been provided in the introduction to ensure applicants are aware of relevant policies that affect wildlife and ecology in the Borough, especially those within the Bexley Local Plan.

D 04

One representation suggested adding further detail to the accompanying figures, namely a map of the landscape features within the borough. However, given the extent of information currently shown by the map, the Council took the view that any further detail would be best shown within a future SPD. Comments to include further detail on the subject of landscape design have been captured in relevant codes later in the document.

D 05

Representations on the subject of protecting local heritage assets were positive in the support for the principles set out in the guidance. No changes were made to this code.

D 06

One representation was supportive of this code, whilst another suggested more specific detail be

provided for applicants on the level of stakeholder engagement projects require. The accompanying figure which outlines the process for applicants to follow has been updated to ensure clarity on which stakeholders to engage.

D 07

One respondent commented that following LETI principles which propose appropriate building forms for different typologies, would result in less interesting or aesthetically pleasing architecture. However, there is no reason that following these principles should impact upon design quality and the guidance remains as at consultation. No changes were made to this code as a result of the representations received.

D 08

Some representations commented that some guidance in this section lacked clarity, and this has been addressed by simplifying the language used to ensure it is easy to follow what is being asked of applicants.

D 09

Representations on this subject were largely supportive, with the Environment Agency suggesting further guidance be added on the subject of setback distances when designing adjacent to rivers and flood defences. This has been addressed in code D 35 where additional guidance has been added on designing for flood risk following this, and other, representations made by the Environment Agency.

D 10

The Environment Agency recommended the guidance provided in this code be bolstered to address the impact of views caused by raising tidal flood defences. Given the overarching guidance within the Design Principles regarding views across the whole Borough, not just at riverside developments, it was determined that further guidance on this specific type of development will be provided within the Area Types SPD forming Part 2 of the Design Guide.

D 11

Representations made suggested that potential blank frontage caused by flood defences should be addressed in this code and reference has been included within this code and will further be addressed in the emerging Area Types document.

D 12

Commentary on the content of D12 was supportive and did not require any adjustments to be considered.

D 13

Some of the representations received on this code were considered to be too specific for this overarching guidance document, but have been noted and will be addressed in forthcoming SPDs. Where appropriate, changes have been made to the guidance to provide further clarity and additional guidance on the subject has been included.

D 14

The representations on this code proposed minor updates to the text and further clarity on some of the guidance - these updates have been made.

D 15

Representations were supportive of this code and suggestions for further clarity to be added to the guidance were suggested by multiple representations. These have been accommodated within the document with new policy points added and other existing policy points have been amended for robustness.

D 16

Where representations suggested a lack of understanding of the guidance included within this code, further clarity has been provided by making minor updates to the text.

D 17

The representations on this code were positive and supportive of the principles of the code. Some minor updates to the text have been made to add

further clarity to the guidance.

D 18

The representations proposed minor updates to the text and further clarity be provided, which has been done in the adoption final draft of the document.

D 19

Representations on this code proposed minor updates to the text to improve the clarity of information provided. Other comments made were noted for their relevance to the emerging documents proposed for Part 2 of the Design Guide SPD and added to the tracker document and will be included in the appropriate, more specific guidance.

D 20

Following a review of the comments received, minor updates to this code have been made. The Environment Agency suggested amendments to the guidance, and this was included within D35 which felt most suitable.

D 21

Further detail was added to the policy context in the introductory paragraph following comments made by the Port of London Authority. Other comments were supportive of the guidance provided, and where necessary, representations made by the Environment Agency have been noted for inclusion within the appropriate document of Part 2 of the Design Guide SPD.

D 22

No changes were made following the representation received which expressed disappointment that no expectation was stated for applicants to meet the best practice space standards for new development. It was determined that, whilst this is certainly the Council's aspiration, it is not currently policy and therefore cannot be enforced through these guidelines.

D 23

A number of representations proposed minor

updates to the guidance such as the inclusion of other publications for applicants to review when proposing new development. Further guidance has been added to D 35 following comments from the Environment Agency, as D 35 was deemed the most appropriate code to address comments on riverside development. Aspects of the representation have also been noted for inclusion within Part 2 of the Design Guide SPD in an appropriate guidance document.

D 24

Comments received were generally positive about the guidance included within D 24. One representation received commented on the lack of clarity in the colours used in a map and this has been updated to make the colours easier to differentiate. Multiple representations suggested bird bricks be referred to as swift bricks, which reflects the wording used in the Bexley Local Plan, and this has therefore been updated within the Design Principles. Further information on policy documents for applicants to refer to has also been added to the code.

D 25

Representations on this code referred to the inclusion of information considered too detailed for the Design Principles and have been noted for inclusion within documents forming Part 2 of the Design Guide SPD.

D 26

Commentary on the content of D 26 did not propose any adjustments to be considered within the Design Principles and where relevant, representations have been noted to include guidance within the emerging guidance documents that will form Part 2 of the Design Guide SPD.

D 27

One representation suggested further detail be added when referencing an outside source, which was added to the code to provide readers with further references to consult. Other representations commented on the inclusion of more guidance addressing individual safety,

including that of pedestrians and cyclists, within the public realm and guidance has been added to D29 which focuses on this topic. Some comments received asked for further clarity and more context to be included, which has been provided where appropriate.

D 28

The comments received on this code were supportive and required only very minor updates to this code to update some wording.

D 29

Representations suggested the content focused overly on vehicle users more than other street and road users. To address this, additional guidance has been included in the code to ensure pedestrians and cyclists are considered equally across all new development. Where relevant, comments more suited to the emerging, detailed guidance documents that will form Part 2 of the Design Guide SPD have been noted and will be addressed in this guidance.

D 30

Commentary on the content of D 30 from the Environment Agency has been addressed in D 35, which was deemed the most appropriate location for the guidance suggested by the consultee.

D 31

Minor updates to wording have been proposed in representations to ensure guidance is clear and these have been addressed in the updated version of the SPD. Further guidance has been provided in D 35 to respond to comments received from the Environment Agency, as it was deemed the most appropriate location within the SPD.

D 32

Representations received were supportive of D 32. Where necessary, further robustness and clarity has been added to some guidance policies in this code. In some instances, comments have been addressed in other, more appropriate codes within the document and others will be addressed in forthcoming guidance documents forming Part 2

of the Design Guide SPD.

D 33

Where appropriate, notes have been made of representations that will be addressed in documents in the emerging Part 2 of the Design Guide SPD.

D 34

Several representations were received on D 34 from both statutory consultees and local residents. As such, the guidance outlined in D 34 has been supplemented with further information regarding Biodiversity Net Gain, the protection of existing trees including veteran and ancient trees and the monetary implications for developers that pre-empt planning permission by removing existing trees.

D 35

Following representations from the Environment Agency, much of this code has also been updated to include further detail on development along rivers. Additional resources have been also provided within the policy context introductory paragraph to support applicants. Some suggestions proposed for inclusion within representations were deemed too detailed for this overarching guidance and will instead be included within the more specific Area Types guidance document forming Part 2 of the Design Guide SPD.

D 36

Representations made on D 36 were largely supportive and only very minor updates were made to add further context to the guidance.

D 37

It was determined that a representation made on this code was addressed in an earlier code and therefore no changes were made following this comment. The other comment received suggested an edit to the wording of one sentence, which was adjusted to suit.

D 38

Representations made were welcoming of the

guidance in this code and where relevant, any changes proposed have been noted for inclusion within emerging, more detailed guidance documents within Part 2 of the Design Guide SPD.

D 39

Few updates were required to the content of D 39 as a result of representations made. In some instances, comments made have been noted and will be addressed in guidance documents in Part 2 of the Design Guide SPD.

D 40

Representations were supportive of the guidance contained in this code. Minor updates were made to this code to address one consultee who raised a lack of clarity with one policy, otherwise no other changes were made.

Glossary

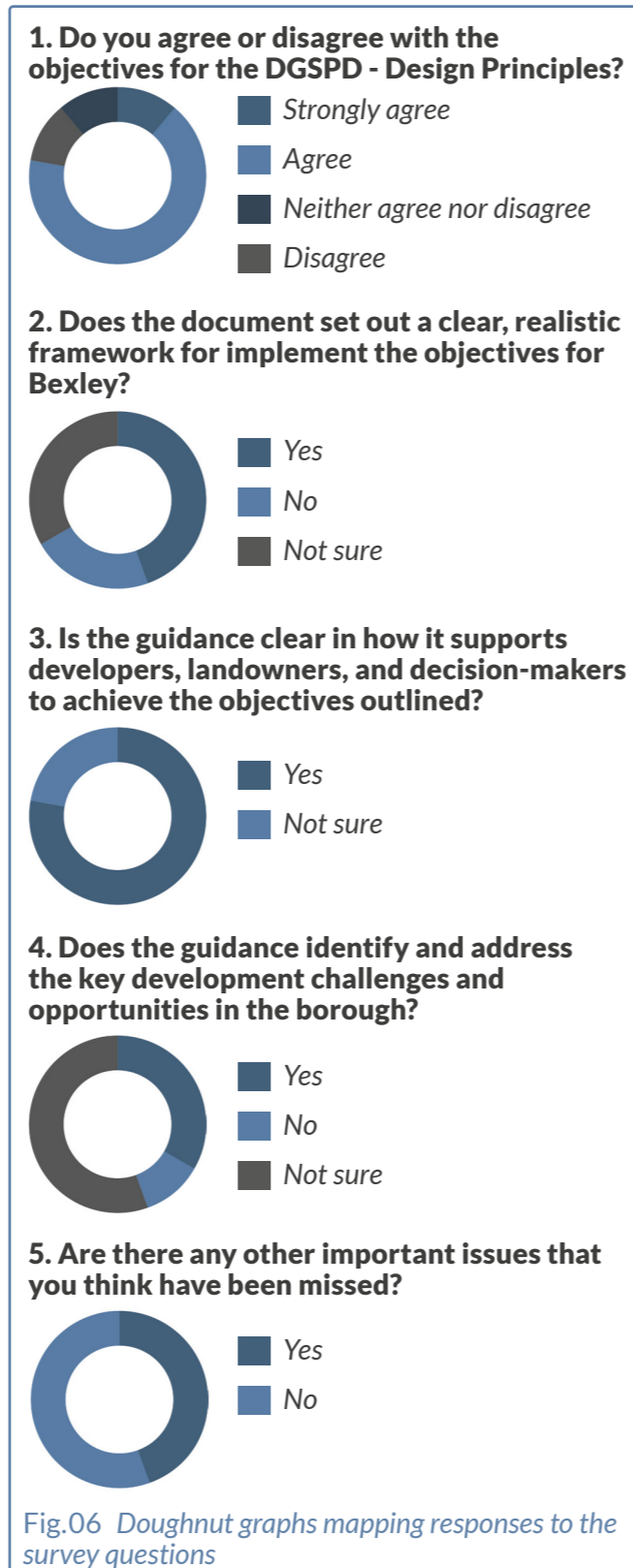
Minor updates to the glossary were made following comments regarding the clarity of some definitions.

Miscellaneous comments

A number of miscellaneous comments were received that were not relevant to any one section. These have been reviewed and where appropriate, changes have been made to the document. In some instances, no changes have been made, but these may be addressed in future, emerging SPDs. Some of these comments have been passed onto colleagues within the Place directorate for review, such as Heritage and Enforcement, as comments fall within their remit rather than being addressed by the Design Principles.

Online survey responses

Eight people completed the online survey responding to the seven questions that sought respondents' views on the consultation draft Design Guide SPD (DGSPD). The questions asked in the survey are below, with the options for response below in italics with the results opposite in Fig. 06.



1. Do you agree or disagree with the objectives for the DGSPD - Design Principles?

Strongly agree, agree, neither agree nor disagree, disagree or strongly disagree

2. Does the document set out a clear, realistic framework for implement the objectives for Bexley?

Yes, no, not sure

3. Is the guidance clear in how it supports developers, landowners, and decision-makers to achieve the objectives outlined?

Yes, no, not sure

4. Does the guidance identify and address the key development challenges and opportunities in the borough?

Yes, no, not sure

5. Are there any other important issues that you think have been missed?

Yes, no

6. Do you have any comments about how easy the document is to use and understand? (optional)

7. Please share any additional comments or feedback about the document (optional)

Respondents were also given the option to include further information with their responses, which some took the opportunity to do. The survey responses were largely supportive of the guide and the objectives set by the Council, with respondents citing that the “brief is reasonably clear,” “the layout made for an easy read” and that “it is important to have design guidance to make it clearer which applications are acceptable in the borough and which are not”.

Where feedback is more critical of the Design Guide SPD Part 1 - Design Principles, respondents stated that “it does state what is required of applicants, although not always realistically i.e. what is acceptable for smaller developments” and “have we covered all eco and sustainability issues for the future?”

On the first point, this has been considered whilst making changes to the SPD ahead of adoption, however as the emerging Small Sites design guidance is focused on smaller developments, the Council proposes that this will instead be covered within this document rather than the Design Principles.

Regarding sustainability and eco issues, these are addressed throughout the various codes within the Design Principles, however there is scope to include further guidance pertaining to specific development types common across the Borough, that will be contained within the guidance documents forming Part 2 of the Design Guide SPD.

Conclusion

Reflecting on the engagement undertaken throughout the process of drafting the Design Guide SPD Part 1 - Design Principles guidance document, the objectives have been achieved as laid out below. The process has been an opportunity to consider lessons learned and how these can be applied to future consultations on the forthcoming Design Guide SPD Part 2.

Achieved objectives:

- **To establish a deeper understanding of the key local design issues and opportunities that the Design Guide SPD Part 1 - Design Principles aims to address.**

The initial scoping exercises, internal stakeholder consultation and evidence gathering allowed Officers to understand the key issues that the Design Guide SPD Part 1 - Design Principles should address.

- **To seek internal and external stakeholder views on the proposed objectives, themes and topics of the Design Guide SPD Part 1 - Design Principles.**

Both the internal stakeholder consultation and that undertaken during the statutory consultation period were useful in evolving the content of the design guidance in the first instance, and then allowing further views to be heard, considered and used to inform changes to the guidance document to ensure it meets the objectives set out by the Council.

- **Reach a broad and diverse audience through a variety of engagement methods and encourage comprehensive comments and feedback.**

The consultation was advertised in advance through a variety of methods, both physically and digitally. A range of individuals and businesses on the Strategic Planning database were invited to respond to the consultation. A mixture of in-person events and online methods



Fig.07 Image from Bexleyheath Central Library drop-in consultation event

were designed to reach as many individuals as possible.

- **Ensure that those who might be directly affected by the guidance are informed and have their opinions heard, recorded and considered, meeting the requirements of the Council's Statement of Community Involvement (SCI).**

The consultation undertaken between July and September 2024 was designed to maximise accessibility and the statutory consultation period was extended from the typical four weeks to eight, in recognition of the school summer break.

- **Identify successful aspects of the consultation strategy and where lessons could be learned and how to implement these for future engagement and consultation.**

The written responses were the most successful aspect of the consultation, however there was room for improvement in terms of footfall at the drop-in events held that will be considered when consulting on the documents that form Part 2 of the Design Guide SPD.

Given the technical nature of the documents being consulted on, the Council will consider how to it can better summarise and simplify the information provided.

Further consideration will also be considered by the team on how best to publicise future in-person events for Part 2 of the Design Guide SPD.

Planning and Compulsory Purchase Act 2004 (as amended), Regulation 12(a), The Town and Country Planning (Local Planning) (England) Regulations 2012

Bexley Design Guide Supplementary Planning Document (SPD), Draft For Consultation

Consultation Statement

Section 19 of the PCPA2004 sets out the requirements for the preparation of local development documents and Part 5 of the 2012 Local Planning Regulations provides the process for the preparation of supplementary planning documents.

Regulation 12(a) states that before a local planning authority adopt a supplementary planning document it must prepare a statement setting out –

- (i) the persons the local planning authority consulted when preparing the supplementary planning document;
- (ii) a summary of the main issues raised by those persons; and
- (iii) how those issues have been addressed in the supplementary planning document

The Council has prepared a Design Guide (consultation draft) supplementary planning document. Table 1 sets out the names of the persons the Council consulted in preparing the draft SPD, and the method of consultation.

All consultees were engaged at various key stages on sections of the document relevant to their expertise. Engagement was both online and in-person, with interactive workshops that typically comprised of progress presentations with questions to prompt discussion. Feedback was provided at and following the sessions. Table 2 sets out a summary of the main issues raised in those sessions and how those issues have been addressed in the draft SPD.

The draft SPD takes into account comments received from consultees. It also reflects government guidance and the London Plan (2021), as well as policies in the Bexley Local Plan (2023).

The following engagement exercises were undertaken:

- Pre-consultation
- Officers workshop
- Members workshop

The following tables summarise the engagement undertaken and key issues.

| Name of person consulted | Method of Consultation |
|--|---|
| Council officers from relevant departments | Quarterly meetings of the Officer Steering Group Officer working groups at workshops and pre-consultation meetings Senior Officer briefings |

| Name of person consulted | Method of Consultation |
|--------------------------------------|---|
| Cabinet Member and Local Councillors | Attendance at workshops and pre-consultation meetings |

Table 1: Consultees engaged with when producing the consultation draft document

| Summary of main issues raised | How the main issues have been addressed |
|---|--|
| procedural matters – what extant guidance is the document replacing | A table has been created that sets out the guidance being replaced by the design guide in an updated policy context section. |
| clarity of the information – who is the document intended for and how do they use it, and can they understand the planning terms | A subtitle to the document has been added and text revised for clarity, both in the introduction and also within sections, which direct the reader to design guidance that is directly relevant to their type of development proposal. In addition, glossaries have been updated using verified sources and to ensure consistency with the glossary in the local plan. |
| level of detail – the content is quite comprehensive and there is a danger that the document will be difficult for people to use | The draft SPD has been split into parts, with the main section – the design principles – being produced for consultation first. This will be followed by specific information on typical sites, buildings and places in documents published separately to clearly define and illustrate what is expected for well-designed places. |
| locally relevant – the guidance should reflect Bexley’s character and address design matters that relate to this | Further text has been added to the document to strengthen local context, including local views, and links added to reference documents such as the conservation area character appraisals and management plans and the Bexley local character study. |
| consistency – need to ensure that the guidance directly relates to higher level plans and policies and does not replicate guidance produced nationally and London-wide | The policy context section has been updated to reflect the planning policy hierarchy, with the development plan and supplemental guidance, both adopted and emerging, illustrated. Sections where new legislation is in place (e.g. BNG requirements) have been updated |

Table 2: Main issues raised and how they were taken into consideration when producing the consultation draft document

