

**Supplementary Planning Document (SPD) Regulation 18 Statement for:**

***Design For Living: Bexley's Residential Design Guide*  
and its associated Sustainability Appraisal Final Report**

Bexley's residential design guide, ***design for living***, is a Supplementary Planning Document that is one of the Local Development Documents that comprise the Local Development Framework (LDF).

The *Planning and Compulsory Purchase Act 2004* requires that a local planning authority shall not adopt a Supplementary Planning Document until they have:

- (a) considered any representations made during the consultation period; and
- (b) prepared a statement setting out a summary of the main issues raised in these representations and how these main issues have been addressed in the Supplementary Planning Document that they intend to adopt.

The ***design for living*** documents have now been through the six-week public consultation period, which ended on the 4<sup>th</sup> of November 2005. The documents were consulted on widely, based on the LDF consultation database that was compiled during preparation of the Statement of Community Involvement. Copies of the documents were sent to over 65 statutory bodies and groups within Bexley with an interest in residential design, such as residents' associations and community forums, the Civic Society and the Bexley Access Group, and over 840 notification letters were distributed. A summary of the representations made, responses by Bexley Council, and actions to the SPD documents follows this Statement as **Appendix A**.

During the consultation period, copies of the SPD documents were available at Borough libraries, the Contact Centre within Bexleyheath Civic Offices, and the reception at Wyncham House. Posters were also displayed at these locations. The documents were available on the Council's website, along with online consultation forms. Presentations on ***design for living*** were made to the Bexley Regeneration Network, the Conservation Area Committee and the Planning Control Committee, and a report of comments received at these meetings follows this Statement as **Appendix B**.

***design for living*** and its associated **sustainability appraisal final report** have been amended to incorporate the actions proposed by Bexley Council in addressing the main issues raised from the representations made during the consultation period.

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**Supplementary Planning Document (SPD) Adoption Statement for:**

**design for living: Bexley's residential design guide**

- (a) Bexley's residential design guide, ***design for living***, is a Supplementary Planning Document (SPD), one of the Local Development Documents that comprise the Local Development Framework (LDF). Bexley Council adopted this SPD on the 21<sup>st</sup> of January 2006.
- (b) Any person aggrieved by this SPD may apply to the High Court for permission to apply for judicial review of the decision to adopt this SPD.
- (c) Any such application for leave must be made promptly and in any event not later than 3 months after the date on which this SPD was adopted.

## Appendix A: Summary of Representations, Responses and Actions for Design for Living SPD (by topic)

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### A Private Environment

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<b>Mr John Mercer</b> <b>Summary of Representation Made</b> Glad to see a re-enforcing of guidelines for privacy.	<b>Bexley Civic Society</b> <b>Bexley Council Response</b> No response required.	<b>Action</b> No action required.	<b>123 8</b>
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### A Safe Environment

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<b>Summary of Representation Made</b> Support reference to 'Secured by Design.' However, the section could be strengthened to make reference to PPS1, the ODPM document 'Safer Places,' and adopted UDP policies. Recommend the emphasis be placed upon the need for crime prevention through good design at an early stage of development...it should be an integral part of scheme conception. Encourage early liaison with the Local Crime Prevention Officer. Additionally, impose planning conditions that ensure 'Secured by Design' initiatives are designed into development schemes.	<b>CGMS on behalf of Metropolitan Police Authority</b> <b>Bexley Council Response</b> While the ODPM document 'Safer Places' is listed on page 35 in the Bibliography / Useful Guidance section, it is not referred to within the document itself. Planning Officers already consult with the Local Crime Prevention Officer on planning applications. 'Secured by Design' principles need to be considered during the concept development stage of the Design Statement, as stated on page 5 (checklist item 3 of Developing the Concept) but not specifically in the Section on 'A Safe Environment'.	<b>Action</b> Make references in the document to the ODPM document 'Safer Places' where appropriate.	<b>175 1</b>
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### Achieving Appropriate Density

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<b>Mr John Mercer</b> <b>Summary of Representation Made</b> The need for compatible scale and massing should apply to ALL developments, not just those in Conservation Areas and Residential Areas of Special Character.	<b>Bexley Civic Society</b> <b>Bexley Council Response</b> It is intended that compatibility of scale and massing should also apply to other areas, as stated in paragraph two on page 13. However, there will need to be a higher level of sensitivity in the areas identified which will impact on the appropriate density of the development.	<b>Action</b> Clarify text to explain that compatibility of scale and massing will apply in other situations.	<b>123 4</b>
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<b>Mr J Farrar</b> <b>Summary of Representation Made</b> The density map appears to show two different density targets for Erith and Abbey Wood. However, the lower density ranges around these areas will still comply with London Plan targets.	<b>Greater London Authority</b> <b>Bexley Council Response</b> Hatched area is shown incorrectly.	<b>Action</b> The hatched area will be removed underneath the blue circles of Erith and Abbey Wood, leaving the higher density.	<b>154 2</b>
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## Achieving Appropriate Density

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### Captain L C Woolger

#### Summary of Representation Made

The section achieves its aims to highlight density of areas in the Borough, etc. Did not realise Sidcup was so high in houses and flats.

### Christchurch Area Residents' Association

#### Bexley Council Response

The housing density ranges shown for Sidcup (within the 800m circle) occur because there is a train station and town centre with good facilities and public transport. The densities shown on the map on page 12 do not reflect current densities, but what is appropriate for new residential development.

#### Action

No action required.

225 4

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### Mr Brian Rodmell

#### Summary of Representation Made

Does not provide adequate explanation of why the currently indicated densities of 75 - 100 dwellings per ha. Should be considered more "appropriate" than the much lower figures of the current Bexley UDP (30 - 53 dwellings per ha. for family; 57 - 83 dwellings per ha. for non-family housing).

### Bexleyheath Meeting of the Religious Society of Friends

#### Bexley Council Response

Page 10 of the documents states: "increased development density can enhance economic viability; support public transport and social amenities; improve the vitality and integration of an area; and aid regeneration." The map indicates increased densities in town centres, with good services and facilities, and around train stations only. Elsewhere, the densities on the map are the same as outlined in Policy H4 of the UDP.

#### Action

No action required.

384 5

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### Mr K Leigh

#### Summary of Representation Made

Concerned that accessibility is not included in Principle on high rise development.

#### Bexley Council Response

Accessibility is being address throughout the document. This principle could also include this issue, although it is covered in general in Principle 5 of Connecting Places.

#### Action

Review and edit sections as needed to include accessibility issues.

1429 4

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## Amenity Space

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### Mr John Mercer

#### Summary of Representation Made

Delighted to see a minimum of 45% amenity space, but the qualifications (atriums, etc) can lead to hard decisions where developers want greater development before amenity interest.

### Bexley Civic Society

#### Bexley Council Response

The Design Guide seeks to introduce flexibility to allow developers to respond to different site circumstances. In some situations, such as town centre developments, the provision of the amenity space as a conventional garden space may not be the most appropriate.

#### Action

No action required.

123 7

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## Amenity Space

**Mr J Farrar**

### Summary of Representation Made

The issue of children's play space does not appear to be adequately addressed. The most relevant regional policy is 3A.15 of the London Plan, which should be referred to for information. Other useful sources are the GLA's Open Space Strategies and Play Guide Strategy.

**Greater London Authority**

### Bexley Council Response

The issues of children's play space in Amenity Space needs to be strengthened.

### Action

Refer to the London Plan policy 3A.15 and the GLA's strategies mentioned in the summary of comments and edit the Amenity Space section as needed.

154 3

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## Car Parking and Servicing

**Mrs Georgie Cook**

### Summary of Representation Made

Thames Water requires 24-hour vehicular access to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable operation of the network with as little interruption to the service as is possible.

**Thames Water Property Services**

### Bexley Council Response

Although Principles 5 and 10 (page 7) of Connecting Places do stress the need to consider all requirements, there is no specific mention of emergency vehicles.

### Action

Include Principle in Connecting Places to that the operational needs of the emergency services are not impeded by the design layout.

6 3

**Mr John Mercer**

### Summary of Representation Made

Glad to see guidelines for car parking. Should there not be an enforceable limit on parking in narrow streets?

**Bexley Civic Society**

### Bexley Council Response

On street parking issues are covered in Principles 4 and 7 in Car Parking and Servicing, with innovative solutions encouraged. UDP Policy T17 and Traffic and Transport Chapter , Annex 1: Parking Policy Standards seek to ensure that sufficient off-street parking is provided so as minimise additional on-street parking. Street parking restrictions are however, a traffic rather than a planning issue. It is not appropriate to deal with this matter through a Supplementary Planning Document.

### Action

No action required.

123 9

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## Car Parking and Servicing

**Mr Brian Rodmell**

### Summary of Representation Made

While discouragement of blank walls for integrated car parking is welcomed, it might be appropriate to add that more such integrated parking could be needed to facilitate the equally welcome size limit on size of off-site parking courts and the reduction of highway parking implicit in the advocacy of narrower carriageways to favour wider footways.

**Bexleyheath Meeting of the Religious Society of Friends**

### Bexley Council Response

These comments have been addressed throughout the document. Principle 5 of Car Parking and Servicing limits the size of parking courts, and Principle 10 of Connecting Places, as well as the caption on the same page, addresses the need for streets to accommodate pedestrians, cycles and vehicles.

### Action

No action required.

**384 8**

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## Connecting Places

**Mr John Mercer**

### Summary of Representation Made

The principles are idealistic as some (many) will be impossible to adhere to. Does the first principle imply that 'sleeping policemen' in their various forms will be abolished?

**Bexley Civic Society**

### Bexley Council Response

When this document is adopted by Bexley Council, it will be used in the preparation of Design Statements by applicants, and in the determination of planning applications, which will include the Design Statements, by Planning Officers. The Principles set out are ambitious, but Members and Officers are committed to making them work. Principle 1 in Connecting Places encourages design solutions that "create a pedestrian friendly environment," and this can be done in a number of ways. The examples stated are not exclusive

### Action

No action required.

**123 2**

### Summary of Representation Made

Consideration needs to be given to the operational needs of the police, and consultation with representatives of the Metropolitan Police Service should take place when introducing any changes to the road infrastructure, to ensure measures that impede the movement of emergency vehicles are avoided.

**CGMS on behalf of Metropolitan Police Authority**

### Bexley Council Response

Although Principles 5 and 10 (page 7) of Connecting Places do stress the need to consider all requirements, there is no specific mention of emergency vehicles.

### Action

Include Principle in Connecting Places to that the operational needs of the emergency services are not impeded by the design layout.

**175 2**

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## Connecting Places

### Captain L C Woolger

#### Summary of Representation Made

This section achieves its objectives, but no mention is made of the noise factor when buildings are built very close; even passageways will not stop this problem.

### Christchurch Area Residents' Association

#### Bexley Council Response

The issue of noise pollution is covered in the third paragraph on page 14 in the statement on Respecting the Environment and, more specifically, in Principle 7 on page 21 in A Private Environment.

#### Action

No action required.

225 2

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### Mr Brian Rodmell

#### Summary of Representation Made

The section on Connecting Places achieves its objectives to a large extent, and while well designed internal routes and linkages are generally desirable to aid community integration, it might be helpful to mention that there is also pressure to close off these routes. Such pressures could be countered by adequate investment in lighting, CCTV, etc.

### Bexleyheath Meeting of the Religious Society of Friends

#### Bexley Council Response

This issue is covered in Principles 9 and 10 in Connecting Places and Principle 7 in A Safe Environment. However, more detail could be added to strengthen these Principles. Following Secured by Design principles is a requirement of concept development in the Planning Submission Requirements section.

#### Action

More detail will be added to Principle 7 in A Safe Environment. Principles 9 and 10 in Connecting Places will be linked to Secured by Design principles, which will be expanded upon in the final document in A Safe Environment.

384 3

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## Creating Mixed-Use

### Mr John Mercer

#### Summary of Representation Made

Planners need to ask themselves if they would want to live in a mixed community where there may be conflict of interests.

### Bexley Civic Society

#### Bexley Council Response

A well designed mixed community, where potential conflicts have been considered in the conceptual stage and solutions offered in the schematic stage, should create a vibrant place to live. A mixed community refers to both a mix of uses and a mix of housing types and tenures, with affordable housing well integrated into the plan. These issues are addressed in the Planning Submission Requirements section, with the well developed plans coming through in the Design Statement. Thus, high quality mixed use developments, an integral principle of sustainable communities, should have resolved issues relating to conflict of interests.

#### Action

No action required.

123 3

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## Creating Mixed-Use

<p><b>Mr J Farrar</b></p> <p><b>Summary of Representation Made</b></p> <p>Reference made to the London Plan policy on Housing Choice (3A.4) is welcome, which seeks 100% Lifetime Homes standards as well as 10% wheelchair accessible units in new developments. It is noted that this document does not refer to these specific requirements; they can be applied directly from the London Plan, as a result of its status as part of the development plan (letter attached to consultation response regarding direct application of London Plan Lifetime Homes policy).</p>	<p><b>Greater London Authority</b></p> <p><b>Bexley Council Response</b></p> <p>Whilst the 100% Lifetime Homes standards, and 10% wheelchair accessible units, in new developments is a requirement of the London Plan, it is not a policy in Bexley's UDP (2004). However, Lifetime Homes is defined in the document's glossary (along with the website address) and there are references to accessibility throughout the document, such as Principle 2 in Entrances and Windows, Principle 3 in Car Parking and Servicing, Principle 4 in Amenity Space, Principle 6 in Creating Mixed Use and Principles 3 and 5 in Connecting Places. Additionally, accessibility is addressed within the caption text under images. However, some further strengthening of this issue is possible.</p>	<p><b>Action</b></p> <p>Strengthen references to Lifetime Homes throughout the document.</p>	<p><b>154 5</b></p>
<p><b>Captain L C Woolger</b></p> <p><b>Summary of Representation Made</b></p> <p>Section achieves its objectives, but - having housing above restaurants, etc., can cause problems with objectionable odours from services, i.e. McDonalds in Sidcup and others.</p>	<p><b>Christchurch Area Residents' Association</b></p> <p><b>Bexley Council Response</b></p> <p>Principle 3 in Creating Mixed Use addresses this issue.</p>	<p><b>Action</b></p> <p>No action required.</p>	<p><b>225 3</b></p>
<p><b>Mr Brian Rodmell</b></p> <p><b>Summary of Representation Made</b></p> <p>Section objectives have generally been achieved.</p>	<p><b>Bexleyheath Meeting of the Religious Society of Friends</b></p> <p><b>Bexley Council Response</b></p> <p>No response needed.</p>	<p><b>Action</b></p> <p>No action required.</p>	<p><b>384 4</b></p>
<p><b>Mr K Leigh</b></p> <p><b>Summary of Representation Made</b></p> <p>Assumes mixed use is defined as a mix of residential and commercial uses. Feels that industrial estates should be separated from residential areas by open space, and that local shops should be in residential areas.</p>	<p><b>Bexley Council Response</b></p>	<p><b>Action</b></p> <p>No action required.</p>	<p><b>1429 3</b></p>

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## General Comment

<p><b>Mr J Farrar</b></p> <p><b>Summary of Representation Made</b></p> <p>The GLA understands that this SPD is linked to saved policies in the UDP (2004). Overall, the document is well laid out with relevant content and clear references to the London Plan. It is in the context of overall support for the document that the GLA offers detailed comments, which should be considered before finalising the SPD to more adequately reflect aspects of the London Plan.</p>	<p><b>Greater London Authority</b></p> <p><b>Bexley Council Response</b></p> <p>Responses and actions will be set out after each detailed comment.</p>	<p><b>Action</b></p> <p>No action required.</p>	<p>154 1</p>
<p><b>Mr J Farrar</b></p> <p><b>Summary of Representation Made</b></p> <p>Despite the staggered timings of publication of both the London Plan and Bexley's UDP, this document attempts to reflect most London Plan policies relating to residential design, which is welcomed. However, the Mayor wrote to Bexley council on 18 June 2004 stating that in his view Bexley's UDP is not in general conformity with the London Plan on a number of issues, including housing provision targets, housing choice and affordable housing targets. The Mayor's decision, though, was not to challenge the adoption of the UDP due to special circumstances. Bexley's UDP will retain development plan status with saved policies for three years from September 2004.</p>	<p><b>Greater London Authority</b></p> <p><b>Bexley Council Response</b></p> <p>This comment relates to Bexley's UDP (2004). The Council believes that the UDP is not in general conformity with the London Plan. Under the Planning and Compulsory Purchase Act 2004, there is a requirement for the UDP to be in general conformity with the London Plan in order for it to be adopted. Bexley's UDP meets the ODPM's guidelines for general conformity in relation to the London Plan and there was no direction from GoL that the UDP should be amended prior to adoption, despite representations on the matter from the GLA.</p>	<p><b>Action</b></p> <p>No action required.</p>	<p>154 6</p>
<p><b>Mr Paul Robinson</b></p> <p><b>Summary of Representation Made</b></p> <p>Interest relates to motorway and all-purpose truck road network; as there are none in Bexley there are no comments to make. It is noted that the M25 is in relative close proximity, however.</p>	<p><b>Highways Agency</b></p> <p><b>Bexley Council Response</b></p> <p>No response needed.</p>	<p><b>Action</b></p> <p>No action required.</p>	<p>200 1</p>



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## General Comment

**Captain L C Woolger**

**Summary of Representation Made**

The planning officers have a major task in enforcing and applying the aims in these documents. The UDP aims are, and have been, ignored on several occasions. The UDP is an excellent document. Why change? If planners and councillors kept to what is stated in the UDP, and the new documents, all would be well and Bexley would be a great place to live.

**Christchurch Area Residents' Association**

**Bexley Council Response**

The new planning act, The Town and Country Planning (Local Development) (England) Regulations 2004, requires a step change in development plans from Local Authorities. Bexley's UDP, being adopted recently (2004) has its policies "saved" under the new system for three years, from September 2004. The Local Development Framework will be replacing the UDP. In regards to high quality design standards, direction is provided from the national level, specifically PPS1, from the ODPM, which states: "design which fails to take the opportunities available for improving the character and quality of an area should not be accepted." Additionally, at the regional level, the Mayor's London Plan sets out design principles in Section B of Chapter 4: Designs on London.

**Action**

No action required.

225 8

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**Captain L C Woolger**

**Summary of Representation Made**

Traffic is a major problem in the Sidcup area, made considerably worse by the unwanted supermarket that has killed off other businesses.

**Christchurch Area Residents' Association**

**Bexley Council Response**

Traffic and town centre vitality issues will be addressed in the Core Strategy Development Plan Document.

**Action**

No action required.

225 7

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**Captain L C Woolger**

**Summary of Representation Made**

Local photos would be more appropriate.

**Christchurch Area Residents' Association**

**Bexley Council Response**

Extensive research and was carried out on the selection of photographs used, to illustrate the specific principles that need to be addressed in good design. Many of them come from the CABA (Commission for Architecture and the Built Environment) photo library. This library contains excellent examples of high quality residential development that have met the requirements of CABA standards. Although local examples of high quality design would be ideal, it has proved difficult so far to identify schemes which are appropriate to the specific issue.

**Action**

Continue to research local examples of high quality residential design, and include in the document if possible.

225 6

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## General Comment

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### Mr Brian Rodmell

#### Summary of Representation Made

Documents uphold many desirable general principles while commending removal of numerous specific planning constraints, but do not provide sufficiently clear guidance on reconciliation of possible conflict between some of the general principles. The absence of the constraints may make it harder to resist pressures from developers seeking greater commercial advantage from cramming in extra buildings by abusing relaxations in the remaining specific constraint on building densities. What is missing is a recognition of the link between greater building densities and higher population densities.

### Bexleyheath Meeting of the Religious Society of Friends

#### Bexley Council Response

Page 12 of Achieving Appropriate Density is quite clear on what locations increased density can occur. Outside of town centres and areas around train stations, the density is the same as in Policy H4 of the UDP. The caption below the map on page 12 reads: "in all cases, density will be considered on the basis of site characteristics, quality of design and meeting the principles outlined in this document." In regards to the link between greater building densities and higher population densities, research is currently being carried out on this issue for the Core Strategy Development Plan Document.

#### Action

No action required.

384 1

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### Rose Freeman

#### Summary of Representation Made

The remit of The Theatres Trust principally relates to the theatre buildings and we therefore have no comments to make.

### The Theatres Trust

#### Bexley Council Response

No response needed.

#### Action

No action required.

1421 1

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### Mr K Leigh

#### Summary of Representation Made

The documents are idealistic and unachievable; the practicalities of achievement have not been thought through properly.

#### Bexley Council Response

Yes, these draft documents are ambitious, but have the full support of Councillors and Planning Officers, who will strive to work towards the guidelines laid down through ensuring compliance of planning applications to the Principles set out in Design for Living.

#### Action

No action required.

1429 1

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## Good Design and Innovation

**Mr John Mercer**

**Summary of Representation Made**

It is important not to permit destructive infilling in areas of good design and having historic amenity space. Some areas as such are not (yet) in Conservation Areas (e.g. Danson Road).

**Bexley Civic Society**

**Bexley Council Response**

Infill development must meet the criteria in Policy H8 of Bexley's UDP, and in accord with Policy G27, and addressed in this document in Principle 4 (page 27) in Features and Details. Some of the sites coming forward for development will be on infill sites, and a Design Statement will address the issues raised. Areas of good design and having historic amenity space will need to be taken account of in the proposed development, and will be a consideration for Planning Officers.

**Action**

No action required.

123 6

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**Mr Brian Rodmell**

**Summary of Representation Made**

The section on Good Design and Innovation achieves its objectives to a limited extent, but undermines its basic message on sensitive integration with surrounding buildings by also accepting dramatic contrast, particularly since the Silvertown illustration seems more likely to bring revulsion rather than "enrichment" as claimed.

**Bexleyheath Meeting of the Religious Society of Friends**

**Bexley Council Response**

A contrast of architectural styles does enrich a streetscape when the design of the building form has responded to the existing buildings. "Responding" does not mean "same as." It is possible to be sensitive to the surrounding buildings without replicating them, and an innovative, high quality design should not be discarded purely because it is of a different style.

**Action**

No action required.

384 7

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## Materials

**Mr Brian Rodmell**

**Summary of Representation Made**

Advocacy of use of strong colour to break down building massing needs to be coupled with warnings about need for restraint - while colour in detailing can be helpful, strong colour for whole walls can have a garish effect.

**Bexleyheath Meeting of the Religious Society of Friends**

**Bexley Council Response**

If colour is used appropriately and convincingly as an integral aspect of the overall design, then it should be used. Assigning constraints on the use of colour is an unnecessary limitation.

**Action**

No action required.

384 9

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## Planning Submission Requirements

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### Mr Jonathan Sheldon

#### Summary of Representation Made

The draft SPD places the requirement for developers to prepare and submit a Design Statement with their planning application. This requirement does not appear to be a policy in Bexley's UDP. PPS12 states (in para 2.43) that an SPD "must be clearly cross-referenced to the relevant development plan document policy which it supplements (or, before a relevant development plan document has been adopted, a saved policy)." Detailed requirements for Design Statements should be in the Council's Development Plan Documents rather than an SPD. The Council should postpone adopting this SPD until there is a policy requiring Design Statements in an LDF DPD.

### House Builders' Federation

#### Bexley Council Response

The additional requirement of a Design Statement for new housing development is procedural, not policy. It clarifies for applicants the supporting material they need to submit as part of the planning application, in order that the process can be speeded up. There is no need to adopt a policy in this respect.

#### Action

No action required.

69 1

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### Mr John Mercer

#### Summary of Representation Made

Presumably the existing forms submitted by applicants will be insufficient for the aspects covered in these pages.

### Bexley Civic Society

#### Bexley Council Response

Form TP1 will need to be reviewed in the light of the SPD.

#### Action

Any minor alterations to the TP1 Planning Application form are an administrative procedure and do not need to be addressed in the SPD.

123 1

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### Captain L C Woolger

#### Summary of Representation Made

Agree entirely with the top sentence but confused by the technical jargon that follows. A full criteria of detail should be available to applicants prior to submission; this may speed up the acceptance or refusal of plans.

### Christchurch Area Residents' Association

#### Bexley Council Response

This document contains the key components for preparing a Design Statement, and, as stated at the end of this section, "early discussions with a Planning Officer will clarify the scope of a Design Statement," which should provide the full details for applicants. However, it is noted that the checklists on pages 4 and 5 should be written in plain English.

#### Action

Review and edit section as needed to remove "technical jargon."

225 1

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## Planning Submission Requirements

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**Mr Brian Rodmell**

### Summary of Representation Made

In relation to large developments, it would be helpful to mention other factors that planning officers should take into account, such as the additional loading on water supply and sewage facilities, especially where higher density developments are proposed. Also to be taken into account, for any large development, should be the demands on local education facilities. The document, therefore, needs to strengthen the "compatible scale" provisions and to clearly specify social factors. All of these should be stated as criteria for new development.

**Bexleyheath Meeting of the Religious Society of Friends**

**384 2**

### Bexley Council Response

These issues are being researched for the Core Strategy Development Plan Document. However, the criteria set out in the Planning Submission Requirements section will take account of additional loading of services such as water supply and sewerage.

### Action

Many of the issues raised here will be covered in a different document. For this document, add more detail to the site analysis and conceptual layout sections of Planning Submission Requirements; add to Principles in Respecting the Environment that "it is the responsibility of a developer to make proper provision for drainage to ground, water courses or surface water sewer."

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## Respecting the Environment

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**Mrs Georgie Cook**

### Summary of Representation Made

Support the reference to water efficiency. Further guidance can be obtained direct from the Environment Agency National Water Demand Management Centre or Thames Water. With regard to surface water drainage, it is the responsibility of a developer to make proper provision for drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding. In the disposal of surface water, recommend that a) new connections to the public sewerage system to not pose a threat of surcharge, flooding or pollution, b) disposal on site without recourse to the public sewerage system be encouraged, and c) a separation of foul and surface water sewerage is ensured on all new developments.

**Thames Water Property Services**

**6 1**

### Bexley Council Response

Within the Planning Submission section there are requirements that "the location of utilities and building services" be determined during the site analysis; that there is "conceptual layout indicating design responses to issues such as...infrastructure and utilities," and that the schematic design demonstrates "servicing strategies." Principle 4 of Respecting the Environment covers the issue of surface water drainage, but more detail could be provided to stress the responsibilities of the developer.

### Action

Review and edit as needed sections in the document pertaining to surface water drainage. Add more detail to the site analysis and conceptual layout sections of Planning Submission Requirements; add to Principles in Respecting the Environment that "it is the responsibility of a developer to make proper provision for drainage to ground, water courses or surface water sewer."

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## Respecting the Environment

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**Mrs Georgie Cook**

**Summary of Representation Made**

Tree and shrub layout needs to be designed to avoid the route of sewers or water pipes, as indiscriminate planting can cause serious damage to the public sewerage system and water supply infrastructure.

**Thames Water Property Services**

**Bexley Council Response**

Within the Planning Submission section there are requirements that "the location of utilities and building services" be determined during the site analysis; that there is "conceptual layout indicating design responses to issues such as...infrastructure and utilities," and that the schematic design demonstrates "servicing strategies." Principle 8 of Respecting the Environment requires "the provision of adequate levels of planting and creation of watercourses within a development." However, there is no direct reference to the need to avoid underground utilities in planting designs.

**Action**

Review and edit as needed sections in the document pertaining to planting layout.

6 2

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**Mr John Mercer**

**Summary of Representation Made**

The section on Respecting the Environment is a good one.

**Bexley Civic Society**

**Bexley Council Response**

No response needed.

**Action**

No action required.

123 5

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**Mr J Farrar**

**Summary of Representation Made**

Greater emphasis should be placed upon sustainable design and construction and, in particular, renewable energy and its importance in combating climate change. The GLA's recent draft SPG on Sustainable Design and Construction may usefully be signposted together with references to London Plan policies relating to energy efficiency and the inclusion of renewable energy technologies within new developments.

**Greater London Authority**

**Bexley Council Response**

Emphasis is placed upon sustainable design and construction throughout the document and will be covered in detail in the Sustainable Design and Construction Supplementary Planning Document due to be published next year.

**Action**

No action required.

154 4

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**Captain L C Woolger**

**Summary of Representation Made**

The section on Respecting the Environment achieves its objectives. Avoid concrete jungles.

**Christchurch Area Residents' Association**

**Bexley Council Response**

Principles 4, 6, 7 and 8 of Respecting the Environment all provide opportunity to avoid concrete jungles.

**Action**

No action required.

225 5

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## Respecting the Environment

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**Mr Brian Rodmell**

**Summary of Representation Made**

The section on Respecting the Environment generally achieves its objectives - but should say more about environmental implications of higher densities, especially for water supply and drainage.

**Bexleyheath Meeting of the Religious Society of Friends**

**384 6**

**Bexley Council Response**

While this issue is covered in Principle 4 of Respecting the Environment, and briefly in the Planning Submission Requirements under site analysis and concept development, more could be added to both these sections of the document.

**Action**

Add more detail to the site analysis and conceptual layout sections of Planning Submission Requirements; add to Principles in Respecting the Environment that "it is the responsibility of a developer to make proper provision for drainage to ground, water courses or surface water sewer."

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**Mr K Leigh**

**Summary of Representation Made**

Water supply, soil resources and quality all need to be conserved.

**Bexley Council Response**

These issues are too broad and would require policy decisions not appropriate for this supplementary planning document.

**Action**

No action required.

**1429 5**

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## Sustainability Appraisal

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**Mr John Mercer**

**Summary of Representation Made**

How far is Bexley promoting Affordable Housing (SPD)?

**Bexley Civic Society**

**123 11**

**Bexley Council Response**

bexley UDP has a policy which positively seeks to secure affordable housing. This policy is being actively implemented in new developments. An Affordable Housing Supplementary Planning Document which provides additional guidance as to how this is to be achieved is currently in preparation and there has been informal consultation with key stakeholders. The SPD will be available for public consultation shortly.

**Action**

No action required.

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**Mr John Mercer**

**Summary of Representation Made**

Can copies of PPS1 and PPG3 be available at Wyncham House and borough libraries?

**Bexley Civic Society**

**123 10**

**Bexley Council Response**

Both Wyncham House and Central Library at Bexleyheath keep these documents in the reference section and they can be viewed; additionally, these documents can be viewed online at the ODPM website and all libraries and the reception at Wyncham House have public access stations.

**Action**

No action required.

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## Sustainability Appraisal

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<p><b>Captain L C Woolger</b></p> <p><b>Summary of Representation Made</b></p> <p>The Sustainability Appraisal is a good report and most interesting, but the Bexley Community Strategy aims must involve the residents of localities, not Councillors who do not heed or listen to the people of the area.</p>	<p><b>Christchurch Area Residents' Association</b></p> <p><b>Bexley Council Response</b></p> <p>Whilst Annex 1 of the Sustainability Appraisal describes the relationship between national, regional and local sustainability objectives, changes cannot be made to the aims of the Bexley Community Strategy as it is a separate, adopted document.</p>	<p><b>Action</b></p> <p>No action required.</p>	<p><b>225 9</b></p>
<p><b>Mr Brian Rodmell</b></p> <p><b>Summary of Representation Made</b></p> <p>Particularly relevant in the Sustainability Appraisal will be the consequences of larger populations in development areas induced by higher building densities - notably greater pressure on schools and health facilities, increased demand for water and for waste water disposal.</p>	<p><b>Bexleyheath Meeting of the Religious Society of Friends</b></p> <p><b>Bexley Council Response</b></p> <p>Higher housing densities will have higher populations with certain effects. The impacts of this are to be addressed through the Core Strategy Development Plan Document and Associated Sustainability Appraisal.</p>	<p><b>Action</b></p> <p>The issues raised here will be addressed in a different document. No action required.</p>	<p><b>384 10</b></p>
<p><b>Mr Brian Rodmell</b></p> <p><b>Summary of Representation Made</b></p> <p>This is misleading in showing higher densities as generally having uncertain effects - more negative effects would be more realistic.</p>	<p><b>Bexleyheath Meeting of the Religious Society of Friends</b></p> <p><b>Bexley Council Response</b></p> <p>Higher densities does not necessarily equate to negative effects. Uncertain effects is the most accurate selection.</p>	<p><b>Action</b></p> <p>No action required.</p>	<p><b>384 11</b></p>
<p><b>Mr K Leigh</b></p> <p><b>Summary of Representation Made</b></p> <p>Questions whether the Design for Living key objectives have been properly assessed against the draft sustainability objectives of traffic impact, air quality, water quality, historic environment, climate change vulnerability, economic growth and inward investment.</p>	<p><b>Bexley Council Response</b></p> <p>This matrix appears over simplified and it is difficult to relate the key objectives of Design for Living with the draft sustainability objectives. However, Annex 1 at the back of the Sustainability Appraisal provides much of the detail for Table 6.1, but this link is not clear in the document.</p>	<p><b>Action</b></p> <p>Clarify the relationship between Table 6.1 and Annex 1. Assess the document key objectives against the draft sustainability objectives to ensure accuracy.</p>	<p><b>1429 2</b></p>



## Appendix B – Comments and Responses from Public Presentations

1. During the six-week public consultation period (from 23/09/05 to 04/11/05) on **design for living, Bexley's residential design guide SPD**, there were three public presentations made about the document. The first public presentation was to the Bexley Regeneration Network on the 19<sup>th</sup> of October. Various Bexley Volunteer Sector Organisations were represented, and a list of attendees is attached. The second public meeting was held on the 27<sup>th</sup> of October for Members of the Planning Control Committee. The third public meeting was to the Conservation Area Committee, and was held on the 3<sup>rd</sup> of November.
2. Comments were received from Members, Officers and members of the volunteer groups. They are summarised in the table below:

Comment	Response to Comment	Action
<b>Bexley Regeneration Network Presentation – 19/10/05</b>		
In Respecting the Environment, mention should be made about the additional surface water run-off from houses where people have paved over their front gardens. The cumulative effects of this can add to localised flooding problems. The amount on non-permeable surfacing should be restricted.	Principle 4 of Respecting the Environment does cover this issue. However, the wording could be changed to include specific reference to localised flooding.	Review and edit sections of the document as needed.
Will specific requirements be given to developments that occur in the Environment Agency's Flood Zone 3?	The EA require Flood Risk Assessments for development located in Flood Zone 3, and this is supported by Policy G8 in Bexley's UDP.	No action required.
Are there any long-term strategic solutions to flooding?	There will be a Supplementary Planning Document on Flood Risk Management, scheduled in the LDF timetable for publication in mid-2007.	No action required.
<b>Planning Control Committee Presentation – 27/10/05</b>		
General consensus that it is important to review all planning applications presented to them using the guidance put forward in this document, once the Council adopts it.	Noted	No action required.
<b>Conservation Area Committee Presentation – 03/11/05</b>		
Increased housing densities should not be a detriment to the quality of life for existing residents.	These issues are covered in the Principles set out in Achieving Appropriate Density.	No action required.
Residential areas need local facilities and services.	Land-use allocations will be covered in the Core Strategy Development Plan Document.	No action required.

## Appendix B – Comments and Responses from Public Presentations

Comment	Response to Comment	Action
<b>Conservation Area Committee Presentation – 03/11/05 (continued)</b>		
Principles 1 and 3 of Connecting Places should be well designed, as poor solutions can be dangerous.	The expectation is that only high quality designs will be approved.	Review and edit sections as needed.
The road layout diagram on page 6 does not show a good solution, as rat-runs would be created by this solution.	The solution presented in this diagram is suggested by the Urban Design Compendium, which is nationally recognised as an excellent resource for urban design. The issue of rat-runs can be addressed through traffic management measures.	Review and edit caption below diagram to address traffic flow concerns. Address management of rat-runs in Principles.
Principle 2 of Good Design and Innovation may be too prescriptive.	This Principle addressed different ways that buildings can fit into the site context other than just by matching the same building style.	Review and edit text to clarify.
Principle 4 of Features and Details too prescriptive, in particular, references to continuing eaves, parapets and guttering lines.	This principle is very prescriptive, using the word “ensure”, rather than “should”.	Review and edit text to clarify.
Make sure there is space designed for storage of waste and recycling bins – include more photos, as this needs to be encouraged.	The document does need more added to cover this issue adequately.	Research and add sections as needed, including photos if possible.
When non-residential developments, such as schools, are built in residential areas, they should be sensitively designed.	Non-residential development is not covered in this document.	No action required.
Higher housing density is a good thing, as it allows for more services and facilities.	Noted.	No action required.
Will criteria be set for room sizes in new development?	Habitable room sizes are determined by the Building Control and Environmental Health regulations.	No action required.
What are the minimum distances between habitable room windows?	Principles 2 and 3 of A Private Environment of the document cover this issue.	No action required.

## Appendix B – Comments and Responses from Public Presentations

Comment	Response to Comment	Action
<b>Conservation Area Committee Presentation – 03/11/05 (continued)</b>		
1) Roof gardens may cause overlooking of existing residential development; and 2) have management problems	1) Principle 8 of A Private Environment covers this issue, but could have additional text added to clarify. 2) Do not wish to restrict the opportunity for roof gardens because they may fail in some circumstances. It will be a matter for consideration on individual planning applications as to whether a roof garden is appropriate to the circumstances	Review and edit text to clarify.

3. List of attendees at Bexley Regeneration Network meeting where *design for living* was presented:

Roy Hillman, Slade Green Community Forum/Tri-forum.  
 Doreen Ives, Erith Town Forum  
 Olwyn Sinclair, BVSC  
 Margaret Bell, Both Parents Forever  
 Jas Dhillon, Neighbourhood Learning in Deprived Communities, ACED  
 Norah Irwin, BADP and PDS  
 Galina Clark, SERLS - FRiendship  
 Josie Barnard, Millennium Volunteers  
 Sue Sutcliffe, Exec Officer, Forums  
 Tracy Pieri, Bexley Council, Lifelong Learning  
 Filomena Brockwell, Danson Youth Centre  
 Paul Tina, Central African Organisation  
 Jon Rouse, the Worx  
 Darren Tobin, Bexley Crossroads  
 Bob Chapman, BCVYO  
 Caroline Love, BVSC  
 Roger Hobbs, 6s Consulting