



THE LONDON BOROUGH
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Urban Design Guide Supplementary Planning Document

Regulation 12(a) Consultation Statement

June 2023

1	Introduction	1
2	Draft SPD consultation information	1
3	Draft SPD consultation responses	2

1 Introduction

- 1.1 This Consultation Statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement accompanies the Urban Design Guide Supplementary Planning Document (SPD). The statement sets out details of the consultation which has informed the SPD, detailing who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.

2 Draft SPD consultation information

- 2.1 From 28 October 2022 to 9 December 2022, the Council consulted on the draft Urban Design Guide SPD.
- 2.2 The consultation was publicised extensively, as follows:
- The draft SPD and a Strategic Environmental Assessment screening statement were hosted on the Council SPD webpage¹, with a link from the main consultation webpage². Comments were invited by email, in writing or via a questionnaire hosted on Survey Monkey.
 - The consultation was promoted in Council's digital newsletter (to 70,000 residents).
 - Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's planning policy database.
 - A Council news releases at launch, with a further release as a final reminder ahead of the consultation deadline. These news releases were also shared with the Council's business contacts, community groups and residents associations, who were encouraged to circulate to their members.
 - Social media posts from the Council's accounts.
- 2.3 34 representations were received in total, as follows:
- 28 via email.
 - 6 responses submitted via the Survey Monkey questionnaire on the Council's website
- 2.4 The Council wishes to thank all respondents for taking the time to respond to the draft SPD. All comments have been considered and have helped to inform the final SPD. Section 3 of this document summarises the comments received and provides the Council's response to the comments.

¹ <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

² <https://www.bromley.gov.uk/consultations>

3 Draft SPD consultation responses

- 3.1 Table 1 summarises the responses received as part of the draft SPD consultation between October and December 2022; and how these responses have been addressed in the final SPD.

Table 1:

Respondent	Consultation response	How has response been addressed?
Individual	Please note in your document the misspelling of Biggin ("Bigging") at point 3.18.	Change - error will be amended
Individual	Document lacks vision and should do more to promote active travel set out how new development should address the modal shift to movement and activity patterns through the design of streets and spaces.	No change – the Council recognises the importance of promoting active travel, and the SPD already includes guidance relating to this (particularly at DG16). The Vision reflects the vision in the adopted Local Plan.
Natural England	The SPD could consider making provision for Green Infrastructure within development. There may be significant opportunities to retrofit GI in urban environments through green roof systems, roof gardens, green walls, new tree planting or altering the management of land. You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. This SPD could consider biodiversity enhancement and landscape enhancement.	Change – the Council acknowledges the importance of green infrastructure. The SPD contains dedicated sections on Landscape, Open Green Spaces, Green Infrastructure, Urban Greening, and Resources and Efficiency which provide detailed guidance on the considerations that have been suggested. Some additional/expanded guidance has been provided relating to biodiversity and landscape design.
Individual	The draft urban design guide on your website lacks a vision for more social housing, which will need to be designed to increase density throughout the borough, including in leafy streets. Without that vision the guide is a document that changes nothing and achieves less.	No change – the Council agrees that provision of new affordable housing is important. The SPD provides guidance that would apply to new housing development but a vision for more social housing is outside the scope of the SPD. Policy relating to affordable housing applies to all relevant developments, as set out in Local Plan and London Plan. There is no need to repeat this in the SPD.
Historic England	Chapter 2: Including a reference to Neighbourhood Plans and Town Centre SPDs is recommended. Figure 1 could be improved.	Change – references to the Orpington and Bromley Town Centre SPDs have been included, and a new Figure 1 diagram has been included. Bromley has no neighbourhood plans hence it is not considered necessary to add reference at this time.
	Chapter 3: Para 3.26 should be accompanied by a list or map of Bromley's conservation areas. A paragraph summarising the archaeological resource/implications is recommended. Recommended that para 3.34 includes a reference to Biggin Hill RAF Conservation Area.	Change – the Council recognises the importance of protecting heritage assets and includes guidance relating to this. A list of conservation areas and archaeological resources is not considered necessary for this SPD; the areas are clearly mapped in the Local Plan and on the Council's website. A reference to Biggin Hill RAF CA will be included as it is relevant to the area's character.
	Chapter 5: The wording of para 5.10 should be revised to reference Bromley's numerous designated heritage assets. The SPD could also include a map illustrating conservation areas and archaeological priority areas. Consider producing a specific Tall Buildings SPD.	Change - Paragraph 5.10 has been amended to reference the numerous heritage assets and CAs within the borough. The suggestion of a Tall Building SPD is noted but is not considered necessary at this stage.
	DG1: Should reference Local Plan policies 38 to 43, London Plan HC1 and NPPF Section 16 and include a reference to archaeology.	Change - Additional policy reference numbers have been added, with additional references to archaeology added in sections 2 and 3.
	DG2: Introductory paragraph should be strengthened with regard to harm and public benefits (suggested text). DG2 should also include the requirement to consider the potential for archaeological impacts of proposals.	Change - Reference to archaeological impacts have been added. DG2 introductory paragraph has also been amended in response to comments.
	DG3: Consider including guidance on the provision of public realm to enhance local character through sympathetic materials, accessibility, and opportunities to reconnect historic routes.	Change – the Council agrees that provision of public realm provides an important opportunity to enhance local character but considers that existing references to public realm improvement and movement route opportunities included in the Layout, Public Realm and Movement sections are sufficient.
	DG4: Should include the need for tall buildings to be carefully designed through 360 degrees with particular care being given to street frontages and servicing. May wish to reference Historic England Advice Note 4 Tall Buildings.	Change – the Council agrees that these aspects of tall building design are important but considers that these points are already covered in DG4. General reference to Historic England advice and guidance notes has been added to section 2.

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	<p>Shopfronts: should highlight that listed buildings will require LBC. Para 5.124 change Beaux-Arts to Arts and Crafts. Para 5.137 could include tile and terracotta.</p>	<p>Change – reference to the requirement for Listed Building Consent has been included in Section 2 (Planning application process). Suggested amendments to the shopfronts section have been made as suggested.</p>
	<p>Public Realm: Could expand this area of advice to encompass sustainable transport infrastructure, signage, access etc. Could reference Mayors public realm guidance (8 principles) and/or consider providing a separate detailed advice document.</p>	<p>No change – the Council agrees that these issues are important for public realm design but considers that the guidance in the Public Realm section already addresses these issues.</p>
Metropolitan Police Service	<p>I would strongly recommend the inclusion of Secured by Design. I note the mention of security rated shutters and toughened glass, tested and accredited products are required.</p>	<p>Change – the Council agrees that designing out crime should be an important consideration. A Designing Out Crime section has been added to the SPD, including a reference to Secured by Design. However, requiring specific tested and accredited products is beyond the remit of the SPD.</p>
Transport for London	<p><u>General</u></p> <p>The content is comprehensive and ambitious. To ensure that it has a positive influence on those proposing and designing new development, it would help if the document could be more visually engaging. The use of precedent photographs is very good, but there could also be diagrammatic drawings to help to make the points described in the text. Similarly, the graphic design could do more to help differentiate between sections, help users navigate the document and find the content they need.</p> <p>Much of the early part of the document reiterates national and London-wide guidance, which shows that this fits into a robust, logical hierarchy. However, some of this context runs the risk of losing the reader in a mass of information and lists of principles from other sources. It would be helpful if the document could do more to translate that guidance into locally specific requirements and more could be done to signpost other guidance rather than restating its contents.</p> <p>It would be constructive and helpful to emphasise even more strongly the role of the street in discussion of landscape, public space or the public realm, or of response to context. Promoting the design of streets as integrated, multi-functional public spaces, with a key role to play in areas such as use and activity, personal safety and response to climate change would be a strong message – related both to the internal streets of new developments and to the streets that form the edges of development sites, which often get overlooked. At present, streets are not mentioned in the Landscape section, paras 5.162 to 5.171. Separating ‘Landscape’ and ‘Public Realm’ may not be a helpful distinction when it comes to good placemaking.</p>	<p>No change – the Council agrees that there is a need to balance text and visuals, but consider that the document achieves the right balance between text, diagrams and precedent images.</p> <p>The supporting text for each urban design element follows a clear structure; beginning with an introduction to the topic, relevant policy context, key aspects, local context/approach, and specific requirements. Rooting the text within the wider NPPF/NDG/London Plan policy framework is considered key to making the document robust. Specific policies are signposted within the Design Guidance Notes.</p> <p>The importance of connected routes and spaces, and ease of movement is highlighted within the Public Realm section. The role of streets as multi-functional public spaces is highlighted within the ‘streets as places’ section of the document.</p>
	<p><u>Principles</u></p> <p>Pg. 28 (4.15) We support the adoption of a design-led approach that optimises the capacity of sites, including site allocations. This should include consideration of connectivity (active travel and public transport) so that the development potential of sites with good connectivity is optimised.</p> <p>Pg. 28 (4.17) Mention of connectivity and permeability could be elaborated in ways that draw on the importance of connecting to local services and promoting walking, cycling and access to public transport.</p> <p>The ‘Assessing good design’ section would benefit from mentioning any assessment tools that the council recommends for testing design quality, such as the Healthy Streets Check or Building for Healthy Life toolkit.</p> <p>Generally this section could be more forthcoming about expectations of prospective applicants for planning applications or pre-application discussions. This could include setting out how the six principles are addressed explicitly in how a Design and Access Statement is structured. There is also a potential role for TfL’s recommended Active Travel Zone assessments in demonstrating how ease of movement and access to services and social and economic opportunities should be demonstrated in a development proposal.</p>	<p>Change – the Council agrees that consideration of connectivity is vital. Connectivity forms part of the design-led approach; it forms one of the six overarching LBB Design Principles referenced in Chapter 4 and has a dedicated section in Chapter 5.</p> <p>The reference made to Connection in Paragraph 4.17 is used in the context of form and layout as one of 3 broad initial design considerations as opposed to specific connectivity requirements which are referenced in Section 5.</p> <p>The intention of the ‘Assessing good design’ section is to highlight the key broad considerations that architects and designers should consider as a starting point to inform thinking as opposed to recommending specific assessment tools.</p> <p>Expectations and requirements for applicants are set out in section 2; the suggestion for applicants to demonstrate how the Council’s six Design Principles will be addressed in the Design and Access Statement has been added.</p>
	<p><u>Movement and Access</u></p>	<p>No change – the Council recognises the importance of ensuring cyclist/pedestrian safety, but consider guidance in section 5 to be sufficient in</p>

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	<p>Pg. 84 (5.106): The focus on cyclist/pedestrian safety in relation to vehicle accesses is welcomed. We would suggest further strengthening this text by noting that vehicular accesses should, wherever practicable, be located along frontages with the least pedestrian/cyclist traffic, and should also promote the incorporation of pedestrian priority measures such as raised crossings to lessen the impact on pedestrian movement.</p> <p>Para 5.106 and policy DG8: There could be more helpful content on how to design for cycle access in employment area, acknowledging both that employees can be encouraged to, or discouraged from, cycling by the facilities at their place of work, and that cycle freight can be important for the efficient distribution of goods locally. At present, the content reads as if pedestrians and cyclists are to be 'designed around' because of road safety issues. There is not enough here on positive encouragement of active travel.</p> <p>It may be desirable to break down the 'non-residential' category into more fine-grained distinctions. For example, the urban design advice that might be given for a 'traditional' industrial estate would be very different from a co-location project. It would be worth referring to GLA guidance on industrial intensification and co-location.</p>	<p>highlighting the key requirements for pedestrian and cyclist accessibility and safety for non-residential developments. Further benefits of active travel are referenced in other sections of the SPD.</p> <p>Officers consider one 'non-residential design' category to be sufficient.</p>
	<p><u>Parking and Servicing</u></p> <p>Pg. 84 (5.107): We welcome the reference to London Plan car parking standards and the statement that car-free development should be the starting point for all development.</p> <p>However some direction could be given on how space for essential parking including Blue Badge parking can best be accommodated in a street environment. More could be done to explore how essential parking can be sensitively integrated, along with elements such as tree planting and sustainable urban drainage.</p> <p>This section deals exclusively with car parking, but no mention is made of cycle parking. It would be helpful to highlight that the provision of high-quality and well-designed cycle parking in line with London Cycling Design Standards (LCDS) can serve as an effective alternative to car parking, particularly in town centres and may help to justify car-free development on sites with more limited public transport connections.</p>	<p>No change - Paragraph 5.107 refers to parking and servicing for non-residential developments. Reference is made in DG11 to street trees and green infrastructure to soften the impact of parking.</p> <p>Cycle parking is referenced in the Healthy Streets section (DG16)</p>
	<p><u>DG8 – Non-residential development</u></p> <p>Pg. 89 (DG8 b)): Again it would be helpful to refer to cycle parking as well as car parking. The list of relevant policy and guidance should also include London Plan transport policies, specifically T1, T5, T6, and T7</p>	<p>Change - The reference to car parking in DG8 relates to minimising the visual impact on the streetscene as opposed to car parking provision. References to additional London Plan transport policies have been added.</p>
	<p><u>Public Realm</u></p> <p>Pgs. 108-116: The Public Realm design principles could place more emphasis on the need to focus on connectivity and permeability in creating successful public places. As noted later in 5.189 connectivity directly influences how places function and feel. This principle could be woven into the Public Realm section more strongly, with a particular emphasis on promoting walkability, cycling, and connections between public transport connections/hubs and public spaces. Further, the approach should encourage the development of spaces that are car-free where appropriate and, where car access is required for whatever reason, to ensure that vehicle movement is subservient to that of pedestrians and cyclists, in line with Healthy Streets principles. LP policy T2 should be cited in the DG10 list of relevant policy and guidance as it is a key principle in people-friendly public realm.</p> <p>We would advise starting with London Plan policy D8 on public realm and demonstrating what is expected from a good local interpretation of the policy.</p> <p>It would be helpful to mention the potential for community engagement and co-design in street and public realm projects, and the possibility of meanwhile and experimental uses of public space, referring to the experience gained in the pandemic.</p>	<p>Change - The five public realm design principles are broad principles which cover the key attributes of successful public realm spaces. The importance of responding to existing routes, connections and ease of movement is referenced in DG10. The 'Connected' and 'Healthy' sections of the document promote walking, cycling and connectivity to transport hubs. Reference to London Plan policy T2 added to DG2.</p> <p>The intention of the document is not to replicate specific London Plan policies, but Policy D8 has been referenced as relevant policy within DG10, The Public Realm section of the document reflects many of the key objectives from policy D8 and sets out how they should be applied in Bromley.</p> <p>The potential and need for public engagement is referenced in the public art, inclusive, and meanwhile use sections of the document.</p>

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	<p><u>Connected – Movement</u></p> <p>Pg. 121 (5.193): It should be made clear here that pedestrian and cyclist (as well as bus) movement takes priority over cars and new street networks should be designed with that hierarchy in mind. This may involve filtered permeability where direct vehicle access may be restricted. A simple way of expressing this would be that permeability should be maximised for pedestrians and cyclists but carefully managed for motor vehicles. Consideration may need to be given to differentiating between emergency vehicles and servicing vehicles and other motor traffic when it comes to access and permeability. It would be helpful to mention London’s experience of Low Traffic Neighbourhoods and whether the council would be open to neighbourhood-scale approaches such as this.</p> <p>Pg. 121 (5.195): Where cul-de-sacs and other non-permeable streets are approved, there should be a strong preference for still allowing pedestrian (and ideally cyclist) through-traffic, if feasible. Similarly, where opportunities to do so are identified, new pedestrian/cycling connections should be made through existing cul-de-sacs and dead ends.</p> <p>Pg. 123 (5.199): We welcome the requirement for development proposals to establish a clear user hierarchy putting pedestrians first, followed by cyclists, public transport use, and finally private motor vehicles. This statement is important and an example of content that should be made more prominent through the graphic design of the document.</p>	<p>No change - an amendment has been made to section on street networks to reflect priority for sustainable transport.</p> <p>The suggestion for paragraph 5.195 is not considered appropriate as it is likely to conflict with Designing Out Crime guidance in relation to cul-de-sacs.</p>
	<p><u>DG11: Movement and Legibility</u></p> <p>Pg. 125 (DG11): We welcome the prioritisation of pedestrian movement (a), the emphasis on improving local permeability and wider connectivity (b) as well as the focus on legible streets and spaces (c) and €.</p> <p>Pg. 126: The section on inclusive design stops short of tackling some of the more difficult issues, such as delineation of street space, use of ‘non-conventional’ surface materials, colourful crossings, tactile paving and pedestrian/cycle shared use. It would be helpful to provide some locally specific guidance based on best practice.</p>	<p>No change - the content of the Inclusive section is considered to be sufficient in outlining the key principles and priorities for delivering inclusive design. The document is not intended to be overly prescriptive with regards to detailed design as referenced in paragraph 1.11.</p>
	<p><u>Healthy Streets</u></p> <p>Pg. 138 – 140: We welcome the comprehensive section on the Healthy Streets Approach and how it should be applied</p> <p>Pg. 139 (5.235): We agree that different streets will require different solutions. However we think the word “almost” could be removed – while it is recognised that some streets will always have a greater role in moving high volumes of traffic (especially freight and buses) than others, we believe that all streets within Bromley, can and should be improved in line with Healthy Streets principles when and if the opportunity arises.</p>	<p>No change - The use of the word ‘Almost’ in paragraph 5.235 is considered appropriate; it reflects the presence and role of some key roads within the borough where the primary function is moving high volumes of vehicular traffic.</p>
	<p><u>DG16: Healthy Streets</u></p> <p>Pg. 140 (DG16): We strongly support the contents of the Healthy Streets policy and its application to all development proposals</p> <p>A potential omission from the document is the inclusion of advice on designing for personal safety and security. TfL would like to see references to issues of road safety (Vision Zero) in the sections on Movement and Legibility and Healthy Streets as well as wider considerations of personal safety and security (including perceptions) when considering all aspects of Urban Design but particularly the Public Realm, Movement and Legibility and Healthy Streets sections. In many cases these considerations will reinforce the case for good design e.g. of lighting, natural surveillance, landscaping, wayfinding and the need to maximise connectivity, permeability and legibility.</p>	<p>Change - Safety is referenced throughout the guidance including within the Inclusive, Public Realm, and Healthy Streets sections of the document. In terms of wider considerations of personal safety and security, a section on Designing Out Crime section has been added.</p> <p>The contribution of good urban design in tackling the climate crisis is referenced throughout the Sustainability section of the document which includes guidance on the importance of sustainable construction, green infrastructure, urban greening, and adaptability and resilience. An additional paragraph referring to the Urban Greening Factor has been added.</p>

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	Similarly, the contribution of good urban design to tackling the climate crisis is underplayed – for example, the importance of tree planting, sustainable drainage, green infrastructure, the circular economy, urban greening factor (UGF). UGF is not covered, for example, in the section on Urban Greening.	
Residents Association	This is a very thorough and detailed draft, and we recognise the limits within which it is drafted. We note the admirable objectives in paragraphs 1.3, 1.6, and 1.7. We note the recent approval of a 12 storey building on the High Street, there is no sign that this building will form part of a general overarching plan. References made to para 5.33 and 5.192 in relation to impact on local infrastructure. Our concern is that there is no overarching masterplan for the Town Centre which will result in the continuation of fragmented design/random new buildings. There is also no masterplan relating to infrastructure.	No change – we recognise the need for holistic consideration of applications in Bromley Town Centre, with regards to design, infrastructure and other issues. The provision of/requirement for an infrastructure masterplan for Bromley Town Centre is beyond the scope of the Urban Design SPD. The Council is preparing an SPD for Bromley Town Centre which will have more relevance to the issues raised by the respondent.
Landowner	A central characteristic of good design and successful places is promoting appropriate land uses within appropriate locations. For example, town centres are facing structural changes as a result of an increasing shift to online shopping combined with a rising trend to shop locally following the Covid-19 pandemic. It is essential that these town centres are flexible to adapt to these changes to retain their competitiveness and vitality. This can include promoting a wider range of uses within town centres beyond traditional retail, such as leisure, cultural, residential, office and community uses, to attract people to live, work and dwell in town centres. We consider that a land based principle should be identified within the SPD. This should identify appropriate uses within the identified borough 'places' set out in Figure 2, which in turn should promote flexibility and diversity of uses within Bromley Town Centre.	No change - The importance of creating a wide range of uses and activities to provide diversity, variety and choice is referenced in the 'Mixed-Use Development' section contained within the 'Responsive' design principle. The ability to be flexible and to adapt is referenced in the Adaptability and Resilience section contained within the 'Sustainable' design principle. As such it is not considered necessary or appropriate to introduce an additional land use based principle within the Urban Design SPD.
	In general, the contextual design principles are sensible and align with adopted regional and local policy. We note that central government guidance states that SPDs should build upon and provide guidance on policies in an adopted local plan. We question the extent to which some principles reflect the wording of the adopted policy, rather than providing additional borough and place specific guidance, e.g. DG2 repeats NPPF and London Plan policy. On this basis we consider this guidance note to be unnecessary and its inclusion should be removed.	No change - reflecting the wider NPPF/London Plan framework is considered key to making the document robust.
	In relation to DG3, we note that part (a) requires development to be consistent with, and appropriate to, the existing urban grain. Paragraph 3.44 recognises that The Glades' large footprint contributes to the east-west severance within Bromley town centre. The draft Bromley Town Centre SPD encourages developments that improve east-west connectivity within the town centre and to be consistent with this DG3 should be reviewed so as not to restrict development options that make improvements to the existing urban grain and enhance permeability.	No change – the Council agrees that increased permeability is important and notes that DG3 does not restrict development options; the guidance encourages permeable routes and connections to be preserved and enhanced, and highlights the importance of legibility, good pedestrian routes and active frontages; these should be key components of any new development.
	We support DG7 which encourages all mixed use development to seek to achieve diversity and choice through a mix of compatible uses and activities that work together to create and support viable places.	No change – support noted.
	DG12 appears to conflate the matters of engagement and inclusive design by reference to 'meaningful early engagement' and achieving 'highest standards of inclusive design' within the same guidance note. It is considered that separate guidance notes should be provided to clearly address each of these objectives.	No change - Meaningful engagement with relevant user groups is a fundamental requirement for delivering inclusive design; it is important to place people at the heart of the design process. Other requirements for public engagement would also apply as part of the planning application process.
Landowner	The NPPF states that 'all guides and codes should be based on effective community engagement and reflect local aspirations'. There is little evidence of community or stakeholder engagement beyond the statutory process to assist in understanding what is special, needs protecting, and what needs to be improved.	No change - Local residents, local interest groups, developers and statutory consultees have all been involved in the consultation process. The consultation process is considered appropriate given the borough-wide scope of the document.
	To an extent this guidance repeats what is said at a national level and is less clear on what it means for Bromley.	No change – while the document does reflect national guidance, it does not merely repeat it. The supporting text for each section follows a clear structure; beginning with an introduction to the topic, relevant policy context, key aspects, local context/approach, and specific requirements. Rooting the text within the wider NPPF/NDG/London Plan policy framework is considered key to making the

Respondent	Consultation response	How has response been addressed?
		document robust. Specific policies are signposted within the Design Guidance Notes.
	The document would benefit from a clear checklist as to what is expected from applicants in terms of submission material and process.	No change - Key submission material is already referenced within the planning application process section in section 2 of the document. A list of validation requirements is not included within the document, as these are provided separately online and not within the remit of the SPD.
	The design principles set out in the document are comprehensive and relate back to the National Design Guide. They reflect the approach taken within our vision at St Mary Cray by advocating for design that achieves broader outcomes – connecting communities, enabling access and inclusion and promoting healthier and more sustainable lives. We welcome the emphasis on ‘place’ and the aspiration to start ‘with people first, the space, then buildings’.	No change – support noted.
	There are significant disparities in the level of guidance provided for each section (i.e. 11 pages for shopfronts and 2 pages for Nature). The guidance would benefit from less detail and focusing on the overall outcomes the Council wants to achieve. Shopfronts or housing design could be separate and signposted from this guidance to make it more legible and proportionate.	No change – there are some aspects of the document that will naturally warrant greater levels of detail. The level of detailed design guidance provided is considered to be appropriate. The six Design Principles reflect the overall outcomes that the Council want to achieve. Creating separate design guides for different elements is not considered preferable to having one dedicated Urban Design SPD; it should be noted that the relevance of each section/element will vary from scheme to scheme.
	Section 4.6 states that the ‘achievement of a successful outcome is a shared responsibility between the various professionals/disciplines involved’ but there is little mention about the process of engagement or the council’s expectations of applicants. Engagement is critical to the delivery of inclusive design and achieving the broader principles set out in the document and we’d encourage the council to set out minimum requirements for how this should be achieved within the development process.	No change – the Council considers that the minimum requirements for applicants are sufficiently referenced at various points in the SPD, notably section 2 and paragraph 4.5.
	Whilst the choice of exemplar schemes is inspiring, it is disappointing that a design guide for Bromley has no pictures of the borough in it. We are pleased to see that the document includes schemes designed by [our firm]. We’d encourage the Council to ensure they have copyright to use the images and would be happy to support that process from our own library if required.	No change - The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.

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	<p>Page 1 references the green belts role in protecting Bromley's special character. Large areas of Green Belt are designated as 'Borough Places' in chapter 3 (Darwin & Green Belt Settlements, Eastern Green Belt) – areas with distinct character referred to as open countryside. In reality the green belt is complex with individual buildings and villages set within it, as well as golf courses, and the substantial airport at Biggin Hill. The urban edge is also a key part of this character but there is limited reflection of its qualities or how some of the poor quality development that characterises certain areas can be addressed.</p> <p>Many of the 'Borough Areas' have had their character defined by urban sprawl and encroachment into the countryside according to the descriptions. Section 3.63 specifically references development within the green belt being a key part of the areas character. We would welcome the guidance setting out how development can positively respond to the green belt – understanding the urban edge, townscape and village settings, view corridors and green infrastructure is critical to a positive conversation about urban infill, regeneration and development opportunities. We feel that further analysis is required to better understand the relationship between built areas and green belt and where opportunities might lie.</p> <p>Section 5.166 specifically states that 'Development proposals within/adjacent to Green Belt, Metropolitan Open Land, or within rural parts of the borough will be required to adopt a landscape-led approach in order to ensure that scheme layouts evolve from the existing environmental features and natural characteristics of Bromley'. We welcome this approach and feel it will be particularly important in addressing development on the urban/ rural edge.</p> <p>We think given the emphasis placed on Green Belt, there could be greater emphasis on green and blue infrastructure across the borough. Landscape-led development should play a critical role in achieving these broader principles.</p> <p>Biodiversity Net Gain has been omitted despite the national requirements set out in the Environment Act. We would encourage the council to ensure they are meeting and exceeding the targets and being clear about the expected principles of an approach (e.g. on-site vs off-site).</p>	<p>No change - Officers consider the Character Appraisal (Section 3) to be sufficient in providing an understanding of the relationship between built areas and green belt.</p> <p>Change – The Council agrees that a reference to Biodiversity Net Gain would be relevant. A new section on biodiversity has been added which includes reference to biodiversity net gain, and reference has also been added to relevant design guidance notes.</p>
Landowner	<p><u>Good Growth, Innovation and the Design-led Approach</u></p> <p>Whilst we agree that a design-led process should begin with an analysis of local character and context, we believe that the SPD should avoid placing an overriding emphasis on 'preserving' and 'safeguarding' existing character in order to positively embrace opportunities for appropriate improvement, growth, and innovation.</p> <p>The SPD refers to preserving and enhancing the 'existing qualities of the borough's townscape, landscape and streetscape character'. This implies that it is the 'qualities' that need to be preserved and enhanced. Whilst 'preservation' is likely to be of greater importance in sensitive locations such as those affecting heritage assets, Green Belt or AONB, it is important that the SPD more broadly encourages "<i>appropriate innovation or change</i>" in accordance with the National Planning Policy Framework (NPPF) (Paragraph 30).</p> <p>Related to this, it is noted that Local Plan Policy 37 does not require existing character to be preserved either, and instead it requires proposals to make a positive contribution to the street scene and to deliver a high standard of design and layout. Supporting text to this policy confirms that the intention of the policy is to ensure that new development makes a positive contribution to the area. We suggest that the SPD should place less emphasis on preservation and instead positively outline the need for proposals to enhance the local area through adopting a design-led approach. The SPD would in this way clearly articulate support for good growth principles and innovation.</p> <p>The SPD should embrace a common thread of innovation, change and growth as a key design principle throughout. Whilst the SPD acknowledges good growth in the policy backdrop to the guidance, it is important that this is translated through into the subsequent sections to positively embrace change in order to accommodate the growth that the borough needs.</p>	<p>No change - The document reflects the importance of understanding existing local character and recognising emerging contexts/opportunities for change as referenced in paragraphs 2.3, 2.16, 3.24, 4.15, 4.16. The need to balance and manage the relationship between existing character and growth is reflected in the Council's Contextual and Responsive Design Principles and the supporting text. The importance of adopting a design-led approach is highlighted in paragraphs 4.14-4.16.</p> <p>Increasing housing delivery is beyond the scope of this SPD, the purpose of which is to improve design quality. The SPD will not have an adverse impact on housing delivery.</p> <p>The document is a Borough Wide Urban Design SPD, guidance is applicable to renewal areas which are referenced within the Section 3 Character Appraisal. The scope and purpose of Section 3 is outlined in paragraph 1.17. Opportunities to create new character and identity and the adoption of a particular design approach are outlined in paragraphs 5.37 and 5.38.</p>

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	<p>Renewal Areas:</p> <p>The above comments should be given greater weight in relation to Renewal Areas within LBB. The Local Plan explains that the borough is home to five designated 'Renewal Areas'. The Local Plan provides a series of policies (Policy 13 – 19) for the Renewal Areas, providing support for the development of housing within them and for proposals that provide demonstrable economic, social and environmental benefits.</p> <p>The SPD should therefore also provide support for proposals that maximise opportunities for enhancement and improvement, steering development to complement and enhance character as required by policy, rather than preserving the existing.</p> <p>While the SPD provides a character appraisal of the Borough Places, inclusive of the Renewal Areas, it should be made clear that these provide high-level place-wide appraisals which provide a starting point for more detailed character appraisals which should be carried out when applying the design-led approach to site optimisation.</p> <p>In this regard, it should also be acknowledged that larger sites provide an opportunity to create new character and identity. This would particularly be the case in Renewal Areas where the Local Plan is seeking that opportunities for enhancement and improvement are maximised, and where existing buildings and spaces may be of poor quality design.</p>	
	<p><u>Tall Buildings</u></p> <p>We support the recognition within the SPD that: <i>“Well-located and well-designed tall buildings can provide important urban landmarks and much needed homes and commercial space at increased densities. They can also facilitate wider regeneration benefits and more efficient use of land”</i>. Other benefits of tall buildings, as outlined at paragraph 3.9.1 of the London Plan, should also be set out in the SPD. These benefits include:</p> <ul style="list-style-type: none"> • Tall buildings can facilitate regeneration opportunities. • They contribute to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. • They can also help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. • Tall buildings that are of exemplary architectural quality, in the right place, can also make a positive contribution to London’s cityscape, and many tall buildings have become a valued part of London’s identity. <p>Taking account of the above, it is important that the SPD does not preclude the delivery of appropriately designed tall buildings which have been developed following a design-led optimisation process.</p> <p>The SPD confirms that the Council will seek to identify suitable locations for tall buildings in the Local Plan review, and we consider this to be the correct approach where appropriately justified with a detailed evidence base as required by the London Plan. Notwithstanding this, as confirmed by the Master Brewer (2021)¹ High Court judgement, there should not be a blanket prohibition of tall buildings outside of identified locations. The High Court in this case held that a tall building should be assessed against the potential impacts outlined in London Plan Policy D9 (Part C), as opposed to assessing the impacts in a vacuum.</p> <p>As such, policies and guidance (including this SPD) should not preclude the detailed case by case, and site-specific, consideration of the suitability of sites for tall buildings as part of the development management process. This should be made clear within the SPD.</p>	<p>No change - The benefits outlined are highlighted in paragraph 5.26 which references the wider regeneration and landmark/wayfinding benefits. The potential of well-connected sites is referenced in paragraph 5.29. The importance of exemplary architectural quality is outlined in paragraph 5.32. Additional relevant London Plan policies are referenced in DG4.</p> <p>The SPD does not seek to preclude the delivery of appropriately designed tall buildings; important factors to be considered in relation to the siting of tall buildings are highlighted in paragraphs 5.27-5.29. These considerations are applicable to all sites including those which may propose the replacement of an existing tall building.</p>

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	<p>It is also noted that there may be existing tall buildings which could be brought forward for redevelopment. In these cases, the SPD should provide support for replacement tall buildings where they deliver improvements in design quality and provide opportunity to enhance the prevailing local character. The SPD should also more clearly support replacement tall building proposals where they contribute to meeting other policy considerations such as site optimisation or re-provision of existing housing. This would also help to ensure that developments are viable and therefore deliverable.</p>	
	<p><u>Open Space and Play Space</u></p> <p>The SPD suggests that new developments should exceed the standards for open space provision in areas identified as having limited access to open green space. This would be challenging to achieve on constrained sites; therefore, this matter should be considered on a case by case basis. Optimising development on brownfield land necessarily involves balancing various planning considerations to ensure viable and deliverable schemes; as such, the SPD should incorporate flexibility to allow for site constraints to be considered.</p> <p>DG14 of the SPD relates to the provision of amenity space, and the general principles of this are supported. In relation to part e) which states all development should “provide play opportunities for at least three stages of childhood” it is considered that the wording should be amended to allow play space provision to be considered on a site specific basis having regard to: play audits inclusive of existing off-site play opportunities, and the proposed child yield. For example, where a site is located in close proximity to existing play facilities and/or a development only yields a small number of older children; on-site provision could result in less usable play spaces and could preclude appropriate site optimisation. Instead opportunities to improve off-site play opportunities could be considered, and this would have benefits for the wider community. Consideration could also be given to alternative amenity provision, such as indoor amenity opportunities.</p>	<p>Change - The potential difficulty in exceeding the minimum standards for open space provision for challenging and constrained sites is noted. DG13 has been amended to state that new open space “should seek to exceed the minimum spatial and qualitative requirements”.</p> <p>DG14 reflects the requirements of London Plan Policy S4; reference to this policy has been added.</p> <p>DG14 does not stipulate ‘on-site’ provision.</p>
	<p><u>Dual Aspect</u></p> <p>Paragraph 5.90 and 5.91 of the SPD outline that dual aspect homes are an “important requirement.” Whilst dual aspect homes should be maximised in accordance with the London Plan, Policy D6 also acknowledges that single aspect dwellings can be provided where it is considered a more appropriate design solution to optimise site capacity. The SPD should be amended to be consistent with the London Plan.</p>	<p>No change - it considered appropriate to highlight the importance of dual aspect units in relation to daylight/sunlight, outlook and cross ventilation; the SPD does not preclude delivery of single-aspect units where justified. Policy D6 of the London Plan is referenced in DG6 under relevant policy and guidance.</p>
	<p><u>Tenure Blind / Neutral</u></p> <p>The SPD refers to development proposals being tenure blind / tenure neutral, and defines this as “no distinction between the visual appearance and general location of different tenures.” Whilst this is supported as a general principle, as a positive step in creating diverse, inclusive and equitable communities; it is important that management considerations are taken into account. This is because shared cores with mixed tenures can result in service charge implications, which in turn can negatively impact upon affordability. The SPD states: “Options for mixed tenure housing include fully mixed, pepper-potted, segmented and clustered layouts” and “Flatted developments should include shared entrance cores and ensure that communal facilities are available and accessible for all residents. It should be noted that mixing tenures by whole building rather than by stair cores rarely achieves an acceptable degree of mixing.” It is considered that these approaches would raise challenges in respect of servicing charges and affordability; therefore, these parts of the guidance should be removed.</p>	<p>No change - the provision of tenure blind / tenure neutral homes is important. Inclusion and social diversity are key considerations in design and should therefore be prioritised; if there are evidenced issues in terms of building management or service charges, the SPD does not rule out separate entrances.</p>
Landowner	<p>2 Legislative and Policy Context</p> <p>2.1 The National Planning Policy Framework (NPPF) defines SPDs as:</p> <p>“Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning</p>	<p>No change - The Council acknowledge the role of SPDs in section 1. The purpose of the document is to set out the key principles for achieving good design and to provide clear design guidance (rather than setting rigid parameters). All schemes will be assessed against the six overarching principles (paragraph 4.19) that are considered essential components in delivering good design.</p>

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	<p>decisions but are not part of the development plan (Annex 2, page 27, NPPF 2021).” [emphasis added]</p> <p>2.2 The government guidance on plan-making in paragraph 008 Reference ID: 61-008-20190315 also provides guidance on plan-making, advising that the role of SPDs is to:</p> <p>“...build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.” [emphasis added]</p> <p>2.3 Whilst we understand and appreciate the need for new guidance to be published, we consider that the Draft SPD should set out ‘best practice’ development, rather than set rigid parameters for every development in the Borough to follow.</p> <p>2.4 We support the overall objectives of this SPD, to guide design principles of emerging planning applications throughout the borough. We would like the draft SPD to acknowledge that schemes can still come forward that do not align with each principle as set out within the document but are still considered appropriate and well-designed, responding well to their context.</p>	
	<p>Growth and Design-led Approach</p> <p>3.1 We support the aspirations of the Draft SPD, which seeks to ensure high-quality design within emerging development within LBB, aligning with the vision set out within the Bromley Local Plan, which recognises the high quality living, working, historic and natural environments within the Borough. We support the SPD’s key role in raising the quality of spatial, urban and architectural design in Bromley which will, in turn, ensure continued investment and economic growth within the Borough.</p> <p>3.2 We observe that in achieving its aims, the SPD places great emphasis on preserving the existing built form and character, ‘stitching new development into the existing urban fabric.’ While this is of key importance in more sensitive areas, such as those containing heritage assets, Green Belt or AONB, the SPD should also promote innovation and change, as set out within point 3.1.7 of the London Plan, which places emphasis on evolution and growth:</p> <p>“3.1.7 As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place’s distinctive character, recognising that not all elements of a place are special and valued.”</p> <p>3.3 We also note the Bromley Local Plan (2019) uses different terminology in regards to the existing built environment, such as ‘respect’, ‘positively contribute’ and ‘enhance’ rather than ‘preserve.’ As such, we encourage the SPD to change its emphasis from preserving the existing built environment to positively contributing to character, to allow for change within the Borough in accordance with the Development Plan.</p> <p>3.4 Linking to this, we consider ‘Good Growth’ a key element of the London Plan which has not been strongly translated into the SPD. Good growth focuses on embracing and managing change in the urban environment, as well as optimising site capacity with regard to housing needs, to accommodate growth in an inclusive and responsible way, would also like to note that LBB’s 10-year housing target has significantly increased through the London Plan (7,740 homes) since the adoption of the Local Plan (6,410 homes). This equates to an increase of 133 homes per annum. The latest Bromley Housing Trajectory sets out the Borough can only supply 3.99 years which is a significant undersupply. As such, we encourage the SPD to take a firmer</p>	<p>No change - The document reflects the importance of understanding existing local character and recognising emerging contexts/opportunities for change at various points. The need to balance and manage the relationship between existing character and growth is reflected in the Council’s Contextual and Responsive Design Principles and the supporting text. The importance of adopting a design-led approach is highlighted in paragraphs 4.14-4.16.</p>

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	<p>approach with regard to the design-led approach and how it can be utilised to increase housing supply by optimising site capacity.</p>	
	<p>We support the aspirations of Paragraphs 1.6 and 1.7 to raise the quality of spatial, urban and architectural design in Bromley, working towards the growth and regeneration of the borough as a whole.</p> <p>Particularly, we believe that windfall development opportunities should be utilised to deliver the wider aims and objectives of housing and growth of the adopted plan, considering its housing delivery shortfall. Great weight should be put on applications that can transform fragmented town centre townscapes into a more cohesive coherent environments, by introducing more legible and accessible routes.</p>	<p>No change - all applications are assessed on their own merits, the importance of introducing more legible and accessible routes is highlighted in the SPD, particularly in DG11.</p>
	<p>We strongly support Paragraph 1.11 as it highlights the need for flexibility in the planning system. Overly prescriptive requirements hinder a site's ability to come forward and respond to site-specific circumstances in a design-led approach, as outlined in London Plan Policy D3.</p>	<p>No change – support noted.</p>
	<p>The SPD should make due regard to the London Plan's Tall Buildings Policy D9 within paragraph 3.50. Guidance should encourage the opportunity for density within sustainable, high PTAL rated areas next to transport nodes, where they do not unduly impact areas of different character.</p> <p>Whilst there is a change in character areas between the town centre and some surrounding areas, this should not preclude or alter the presence of taller buildings within the locality, should the overall requirements of D9 be met, which have a specific set of policy tests for taller buildings to meet.</p> <p>Of particular importance is the consideration of short, mid and long term views within any proposal, which would be an accurate way of assessing sites in Bromley. This would consider the differences between the residential settings and the town centres.</p>	<p>No change - paragraph 3.50 forms part of the character appraisal for Bromley Town Centre within Section 3, the purpose of which is to provide key information about Bromley as a place; it is descriptive and based on fact as a precursor to design guidance provided in Sections 4 and 5. As such it is not appropriate to reference specific design policies in Section 3.</p> <p>Guidance on tall buildings including key siting and design considerations is provided in DG4 and preceding paragraphs. London Plan Policy D9 is referenced throughout the tall buildings section.</p>
	<p>A design-led approach referenced in paragraph 4.14 is strongly supported and should underpin the SPD as a whole. We feel the overall ethos of the design-led approach may be practically obstructed through the adoption of an SPD that suggests how a proposal within Bromley should be adhered to. The Draft SPD should go further and recognise that these are indeed guidance points, allowing applicants to channel paragraph 3.1.7 of the London Plan, which outlines:</p> <p style="padding-left: 40px;">“As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.”</p>	<p>No change - the overall ethos of the design-led approach will not be practically obstructed through the adoption of this SPD. The role and status of the SPD is clear, and as referenced above, the document reflects the importance of understanding existing local character and recognising emerging contexts and opportunities for change.</p>
	<p>Paragraph 5.3 should be altered to incorporate an area's wider potential, including the presence of emerging schemes. Weight is provided to emerging character and context in Policies D3 and D9 of the London Plan and it is recommended that the Draft SPD reflects this.</p>	<p>No change - the need to understand the wider context is highlighted in DG1 and paragraph 5.6, while the requirements of London Plan Policy D9 are reflected throughout the tall buildings guidance section.</p>
	<p>We support development coming forward that make a positive contribution to its wider setting. In reality, townscape visual impact assessments (TVIAs) will be undertaken on major development proposals and will assess a scheme's impact upon its wider setting, in line with London Plan Policy D9.</p> <p>Many applications for taller buildings in London are consented on balance, considering the substantial amount of public benefits provided (such as affordable housing), while having no significant negative impact on surrounding townscape views. The wording of DG1 should be altered to reflect this. We consider that it is possible to respect and conserve existing heritage values and offer an amount of planning benefit that is, on balance, acceptable to decision makers.</p>	<p>No change - DG1 summarises the importance of understanding local context, character and identity. The potential wider benefits of, and considerations for tall buildings are highlighted in paragraph 5.26 and DG4. The relevance of other public benefits would be determined on a case by case basis.</p> <p>In the context of Bromley, which has a predominantly low-rise suburban character, tall buildings are likely to have a greater impact on surrounding townscape views compared with applications for tall buildings elsewhere in London. The narrative and wording of DG1 (and DG4) is considered to be appropriate.</p>

Respondent	Consultation response	How has response been addressed?
	<p>It is suggested that this is reworded to 'all developments proposals should respond to their setting and seek to avoid substantial harm to local character and identity'.</p> <p>We would also recommend that the title of DG1 is altered, as it sets a narrative in the SPD that places aren't able to change:</p> <p>DG1: Creating High-Quality Places</p>	
	<p>We do not support the wording of DG3 on the basis that urban grain is susceptible to change over time and this should not be prevented. This is not in accordance with Policy D1 of the London Plan which relates specifically to an area's 'capacity for growth' in which urban grain is cited as a consideration for this.</p> <p>We recommended that the wording is amended to: a) 'Respond to an area's existing urban grain and capacity for growth appropriately.'</p>	<p>No change - All applications are assessed on their own merit; in cases where the established urban grain is changing, the proposal could address this as part of design justification. As highlighted in DG3 all proposals should seek to <u>create</u> a coherent pattern of development.</p>
	<p>The first sentence (of para 5.20) implies that townscape character is dependent on scale. The GLVIA defines townscape as the "built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces". Para 5.21 is more representative of this definition.</p>	<p>No change – comment noted.</p>
	<p>Para 5.27 - We encourage LBB to use evidence to justify this paragraph. London Plan D9 makes it clear that sustainable locations for tall buildings should be identified in local plans. Prevailing heights and context are a factor in determining locations for tall buildings.</p>	<p>No change - As stated in paragraph 5.25 the Council will seek to identify suitable locations for tall buildings as part of the Local Plan review. Prevailing heights are particularly important in determining heights for new development proposals, not just Local Plan preparation.</p>
	<p>We do not support the current wording of Paragraph 5.33 as the capacity of the local area and transport networks may be improved via financial and non-financial planning obligations. Therefore, proposed developments should not be dismissed based on existing local area capacities and transport networks as their contributions should be used to improve these.</p> <p>Furthermore, issues of servicing, maintenance and building management arrangements will be assessed within the planning submission and may be appropriately conditioned.</p>	<p>No change - Paragraph 5.33 does not indicate that development proposals would be dismissed based on existing local area capacities and transport networks, it states that these capacities should be considered as part of the proposal's functional impact. Servicing, maintenance and building management requirements should be considered at an early stage in the design process to maximise opportunities for a successful resolution; leaving functional considerations to be resolved at the end of the process or by planning condition increases the chance of an unsatisfactory solution. The consideration of the functional impact of tall buildings (including these issues) is a requirement of Policy D9 of the London Plan.</p>

Respondent	Consultation response	How has response been addressed?
	<p>We disagree with the wording of the opening section of DG4 on the basis that development proposals should be analysed holistically in terms of overall benefits. Tall building proposals should not be refused based solely on a 'positive contribution to the townscape' as their benefits may outweigh any townscape harm caused by the development.</p> <p>It is recommended that this wording is amended to read 'development proposals for tall buildings should not negatively impact the townscape, ensuring that their massing, scale and layout responds to the character of the surrounding area'.</p> <p>We are in support of new developments being of the highest architectural design quality, which should be achieved through engagement with Urban Design Officers and Design Review Panels.</p> <p>However, we dispute that this must be achieved through a base, middle and top strategy, as this restricts proposed developments which do not conform to this rigid description. It is recommended that this is removed to allow some design flexibility on a site-by-site basis.</p> <p>We consider Part C of DG4 to be too simplistic in its approach, in opposition to Paragraph 1.11 of the Draft SPD.</p> <p>The design forms mentioned will likely be architectural considerations for all tall buildings, however, they are not the only design forms which might be used to mitigate any transition in scale.</p> <p>Therefore, it is recommended that this is removed and replaced with 'seek to achieve an appropriate transition in scale by considering a variety of design forms which help to reduce the appearance of being dominant and overbearing'. To be informed along with townscape and visual impact assessments where appropriate.</p> <p>We understand that the location of 'marker' or 'gateway' buildings will need to have justification underpinning them. However, the use of 'landmark' and 'marker' in this context is entirely subjective without having any consented policy in place outlining or defining what this built form is categorised as.</p> <p>It is recommended that Part D of DG4 is removed to ensure compliance with the adopted plan.</p>	<p>Change - DG4 does not imply that tall buildings should be refused based solely on the basis of appearance; the SPD sets out a range of considerations, and the relevance of other benefits would be determined on a case by case basis.</p> <p>The reference to adopting a clear base, middle and top strategy reflects the requirements set out in paragraphs 3.9.6 - 3.9.8 (Policy D9) of the London Plan.</p> <p>DG4 (c) <u>suggests</u> different options to achieve an appropriate transition in scale and to avoid a dominant and overbearing appearance. This wording has been amended to clarify that a variety of design forms could be suitable.</p> <p>It is agreed that the functional attributes of 'marker' or 'gateway' buildings are subjective, hence the requirement for a strong evidence-based townscape assessment as stated in DG4 (d).</p>
	<p>We disagree with this statement on the basis that it is too prescriptive and overgeneralises the use of brick slips. Therefore, it is in direct opposition to Paragraph 1.11 of the Draft SPD.</p> <p>Developments should be permitted to use a range of materials where appropriate, as stated in the London Plan Policy D3. Brick slips can enable a development to offer other benefits, such as keeping with local character.</p>	<p>No change - Paragraph 5.52 states that the use of brick slips will not be accepted in <u>most</u> cases, it does not state in <u>all</u> cases; an assessment of appropriate materials will be made on a site-by-site basis taking relevant factors into account (i.e. context, character, scale etc).</p>
	<p>Considering that the colouring of a building may be altered through permitted development, we recommend that Paragraph 5.55 is removed. The materiality of a scheme should be considered by Design Officers on a site-by-site basis and Paragraph 5.55 should be removed.</p>	<p>No change - Colouring is just one of many factors to be considered in relation to retaining a sense of harmony and continuity between new and existing buildings as stated in paragraph 5.55. The potential for colouring to be altered via permitted development is not relevant in this context.</p>
	<p>We disagree with the statement that projecting balconies would not be suitable where they are 'out of character'. A variety of balcony types provide different qualities and the suitability will depend on the make-up of the buildings elevation and how that responds to its near neighbours.</p> <p>Therefore we suggest paragraph 5.70 is removed and replaced with:</p> <p>'Balcony quantum, design, type (e.g., recessed or projecting) and placement should be guided by environmental factors, visual impact and street scene character.'</p>	<p>No change - Paragraph 5.70 does not state that projecting balconies would not be suitable where they are out of character, it simply states that recessed balconies can reduce the visual impact on the streetscene and are <u>typically</u> more appropriate in areas where projecting balconies would be out of character.</p>

Respondent	Consultation response	How has response been addressed?
	<p>We do not support the wording of these paragraphs as they are overly prescriptive.</p> <p>The guidance should be altered to state:</p> <p>'balconies can appear overly 'heavy' if not carefully considered. The design of balustrading, its openness, transparency and materiality should respond to the materials of the building envelope and the character of the area.'</p>	<p>No change - paragraphs 5.72 and 5.73 are not considered to be overly prescriptive; paragraph 5.72 states that solid, enclosed balconies <u>can</u> appear overly 'heavy' (as opposed to open balustrades which <u>can</u> appear 'lighter'). Paragraph 5.73 states that glazed balustrades <u>can</u> appear generic. The purpose of these paragraphs is to highlight the issues that should be considered during the design process in relation to balcony design.</p>
	<p>We do not support the current wording of DG5 as it is overly prescriptive and it is in opposition to Paragraph 1.11 of the Draft SPD.</p> <p>We suggest DG5 should be redrafted to follow:</p> <p>'b) Ensure that materials relate well to the architectural style and ethos of the scheme, i.e. traditional materials for a local vernacular approach, new materials for a more modern approach/methods of construction. The use of high-quality, durable materials is an essential requirement for all development proposals.'</p>	<p>No change - the wording of DG5 (b) is not considered to be overly prescriptive; this part of the guidance simply states that the choice of materials should relate to the architectural ethos of the scheme. DG5 does not prescribe the use of one material over another.</p>
	<p>We do not support the inclusion of Paragraph 5.90 as it is currently drafted. Internal corridors are a design structure often required to optimise sites and minimise single aspect development, in accordance with Policy D6 of the London Plan. Paragraph 5.90 should therefore be removed.</p>	<p>No change - Paragraph 5.90 states that long hotel-like corridors serving single aspect flats <u>should</u> be avoided, i.e. wherever possible. It does not state that they <u>must</u> be avoided in recognition that internal layouts can be subject to site constraints. Policy D6 of the London Plan is referenced in DG6 under relevant policy and guidance.</p>
	<p>The delivery of infrastructure should not impact upon the deliverability and viability of any scheme, as it has the potential to impact upon other planning benefits, such as Affordable Housing.</p> <p>It is recommended that this statement should read 'large developments should also provide appropriate infrastructure, subject to viability, to future proof development, for example provision of new cycle lanes.'</p>	<p>No change – the SPD states that larger development proposals <u>should</u> provide appropriate infrastructure to future proof development, for example provision of new cycle lanes. It does not specify that particular infrastructure <u>must</u> be provided in recognition of site-by-site deliverability and viability considerations. The SPD references the Planning Obligations SPD which provides further guidance on such requirements.</p>
	<p>We strongly support Paragraph 5.202 as it references the development of all scales and the importance of connectivity within Bromley.</p> <p>This statement is in accordance with Policy T3 of the London Plan as it notes the importance of connectivity and the relationships between sites, as well as their wider context which promotes strong holistic growth within the borough.</p>	<p>No change – comment noted.</p>
	<p>We support the aspiration of DG11 and the importance of accessibility within new urban development.</p> <p>In regards to point a) pedestrian priority should be incorporated within schemes, whilst also accommodating the safe, functional inclusion of access by other modes where necessary for the development.</p>	<p>No change – comment noted.</p>
	<p>There should be a recognition in DG17 that including all prescribed design features are not feasible/viable for every new development.</p> <p>It is recommended that DG17 should be amended to say 'all development should seek to achieve the highest standards of sustainable design and construction, where feasible and viable, in accordance with the London Plan and Local Plan Policies'.</p>	<p>No change - DG17 states that all development should <u>seek to achieve</u> the highest standards of sustainable design and construction. The guidance note highlights the key elements that should be considered. The sustainability credentials of individual schemes will be assessed on a site-by-site basis, and applicants will need to demonstrate that policy requirements have been met; non-conformity with policy on the basis of viability will need to be justified.</p>
	<p>4 Conclusion</p>	<p>No change – comment noted.</p>

Respondent	Consultation response	How has response been addressed?
	<p>4.1 In summary, the Draft SPD is not fully supported, predominantly on the basis that it is overly prescriptive in part, which is in direct contradiction with Paragraph 1.11 of the Draft SPD.</p> <p>4.2 We look forward to working with you over the coming months to help define an SPD that is deliverable and appropriate.</p>	
Local Group	<p>Fully support the aims of the SPD, and in particular the support for biodiversity in the Nature section on page 106 (clauses 5.170 & 5.171). Suggest adding following wording: Birds cannot easily nest in new urban landscapes so it is important to provide artificial nest sites such as swift bricks - these are a universal nest brick for a wide range of small bird species. Swift bricks are integrated with the building design and do not require maintenance.</p> <p>Also suggest referencing need for swift bricks to be installed in accordance with best-practice guidance, which for example is provided by CIEEM.</p>	Change – Support for the SPD is noted. The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance, including a new guidance note to summarise the section.
NHS London Healthy Urban Development Unit	<p>With regard to the Inclusive design principle - we would welcome greater reference to age and dementia-friendly design and designing for neurodiversity. There are several recent publications providing advice on inclusive design including the RTPI Dementia and Town Planning (2020) the new British Standard Design for the Mind – Neurodiversity and the built environment (2022) which could be referenced.</p>	No change – while the issues suggested for further reference are relevant considerations, the current wording is considered sufficient in terms of consideration of health issues broadly – it is not considered necessary to set out references to different health issues and specify relevant publications for each.
	<p>Paragraph 4.42 should be strengthened to ensure health and well-being benefits are delivered through the use of monitoring frameworks incorporated within S106 agreements or by planning condition.</p>	Change – the Council acknowledges the benefits of monitoring frameworks, and a reference to the use of monitoring frameworks incorporated within S106 has been added in the 'Healthy' section in section 5 of the SPD.
	<p>SPD mentions HIAs in para 4.44 but has no further reference to HIAs within the SPD. This is a lost opportunity and further detail should be provided, HIAs should also be a validation requirement for major applications.</p>	<p>No change – the Council recognises that HIAs can be beneficial in terms of identifying and addressing health impacts of development. However, there is no Local Plan policy for HIAs, only the reference in Objective GG3 of the London Plan. Therefore, it is not possible to introduce a stronger requirement as this would be creating new policy.</p> <p>For the same reason, the local validation requirements cannot currently mandate submission of HIAs.</p>
	<p>DG8 (d) could be strengthened using the words 'require' or 'expected'.</p>	No change - The wording of DG8 (d) is considered to be sufficiently robust.
	<p>DG11 (e) wording could be strengthened in relation to wayfinding and what constitutes good wayfinding.</p>	No change – Elements which aid wayfinding are already referenced in paragraph 5.203 which, when read alongside the accompanying paragraphs within the Legibility section and the content of DG11, provides clear guidance.
	<p>DG12 (c iv) should be expanded to include “lifts to be designed to accommodate an ambulance stretcher with two paramedics and their equipment”.</p>	No change - The wording of DG12 (c iv) is considered to be sufficient.
	<p>Tall Buildings section should contain an additional clause which seeks to ensure that tall buildings are designed to prevent suicides.</p>	No change – ensuring that tall buildings are safe is an important consideration. The SPD guidance on tall buildings already refers to safety.
	<p>It is important that safe and accessible parking for emergency vehicles is provided within schemes along with electric charging points.</p>	No change – the Council agrees that such provision is important. The provision of accessible parking spaces and EVCPs are planning policy requirements, as set out in the Local Plan and London Plan. The SPD does not need to repeat these.
	<p>There are a wide range of design decisions and details which can help support health and wellbeing and we would welcome links in the document to illustrate good practice. For example, the siting of staircases in building lobbies before access to lifts encourages the use of steps and increased physical activity. While these may be small elements added together they contribute to healthier and safer environments.</p>	No change – the Council agrees that there are likely to be a number of relevant considerations on a case by case basis. However, as stated in paragraph 1.11, the guidance within the document is not intended to be overly prescriptive but aims to outline the key design principles that should be followed, detailed design decisions are assessed on a scheme by scheme basis. It is therefore not

Respondent	Consultation response	How has response been addressed?
		considered appropriate to provide exhaustive lists of a range of potential best practice documents.
Landowner	Respondent is broadly supportive of the guidance contained within the Council's Draft Urban Design SPD. However, in the context of the Council's poor housing land supply any guidance provided to support the Council's planning policies should ensure that it does not limit the opportunities for sites in sustainable locations to deliver an enhanced built form that offers a suitable range of uses, including the delivery of new homes. Additionally, the PPG confirms that SPDs should not add unnecessarily to the financial burdens on development. Thus, SPD guidance that incurs inappropriate financial burden that has a disproportionate effect on the deliverability of residential development should not be adopted.	No change - The SPD is a positive document which sets out design guidance applicable to planning applications in the borough. Respondent has offered no detail on what the inappropriate financial burden what be, bar a very high level comment that it would render development proposals unviable. The Council considers that the SPD will not unduly restrict development, or add unnecessarily to the financial burdens on development, as the SPD adds further guidance to existing policy.
	<p>DG1 - Whilst it is acknowledged that reinforcing local character and identity is an important element of new development proposals, this should not be too rigorous as to restrict or limit the ability to bring forward new development, or develop a site, to provide a more suitable use that supports the wider regeneration of Bromley.</p> <p>Therefore, it is considered that the wording in DG1 should be updated to provide more encouragement of the redevelopment of underutilised brownfield sites at appropriate locations, where it can be demonstrated that, on balance, the development will not result in unacceptable adverse impacts the local character and identity of the area.</p> <p>In addition to this, DG1(d) provides a vague reference to 'Heritage buildings'. This should be clarified.</p>	<p>Change - The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process.</p> <p>Heritage Asset is defined in the Local Plan, which references the NPPF definition. Minor amendment made to DG1 to clarify definition.</p>
	DG2 - Our client appreciates that preserving and enhancing heritage assets is an important role in the design of any development proposal. However, the wording and guidance included is too ambiguous and does not provide clarity on what may be defined as a heritage asset and thus what this guidance would relate to. Therefore, it is considered that the wording in DG2 should be updated to reflect NPPF paragraph 189.	No change – the Council disagrees that the term “heritage asset” and/or its use within DG2 is vague or unclear. Heritage Asset is defined in the Local Plan, which references the NPPF definition. DG2 references relevant Local Plan policy and NPPF sections.
	In addition to this, DG2(d) again makes vague reference to heritage buildings and should also provide specific details of what the Council define as a heritage asset in order to provide developers with a steer on what sort of design measures will be necessary to ensure that their significance is preserved or enhanced. As currently written, DG2(d) includes too much ambiguity and should provide a definition of heritage assets that follows that provided within the NPPF glossary.	Change – we acknowledge the potential confusion between heritage buildings and assets. A minor amendment has been made to DG2(d) to refer to heritage assets.
	Draft Policy DG2(e) seeks to introduce new policy requirements for development proposals, requiring interventions relating to listed buildings to be flexible, adaptable and reversible. As set out in the PPG, the purpose of SPD is to build upon, and provide more detailed advice on policies in an adopted Local Plan. As they do not form part of the development plan, supplementary guidance cannot introduce new policies. Thus, inclusion of DG2(e) within the SPD is inappropriate and should be removed.	Change - DG2(e) uses a widely recognised sustainable (architectural) approach to reusing/repurposing buildings, including buildings that might be/are considered to be a heritage asset. This criterion does not introduce new policy/policies, it provides further guidance to existing policies in the Local Plan (e.g. policy 123) and London Plan (e.g. HC1). Policy references have been added to DG2 to clarify this. A minor amendment has been made to require 'where feasible', recognising that there might be circumstances where this approach is not possible.
	<p>In regard to DG3(a) the principle of requiring development to respect and maintain existing plot widths is supported, but this is too restrictive in its current wording, which seeks to ensure this is dogmatically required as part of development.</p> <p>Therefore, DG3(a) should be amended to state: “Be consistent with, and appropriate to, the existing urban grain, whilst offering a development that can maximises the development potential of a site and can demonstrate that the design responds sensitively to the surrounding area”</p>	No change - This criterion is worded to ensure the principle(s) of DG3 is applied wherever possible. The design-led approach (London Plan Policy D3) sets out guidance to ensure development proposals are informed by the characteristics of the site. Existing urban typologies – the pattern of development – are considered to be important components of a site's characteristics, and therefore fundamental to achieving well-designed places.
	The implications of DG3(b) are too spurious and would overly constrain development, Respondent suggests the following amendment to this guidance (strikethrough text proposed to be deleted): “Respond to existing building lines and continue established street patterns and frontages where it is an integral part of local character. Permeable routes and connections should be preserved and enhanced”	Change – the Council recognises that there may be circumstances where continuing established street patterns is not possible, therefore a minor amendment has been made to DG2(b) to provide more flexibility.

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	<p>Moreover, it is considered that DG3€ has not been prepared positively and is therefore contrary to plan-making guidance set out within the NPPF. The implications of the guidance are too onerous and confusing. Tall buildings can respond very well to existing streets provided entrances and lower floors address streets appropriately, whilst the second sentence of (e) is contradictory, and neither precise nor relevant. DG3(e) should be reworded to set out: "Ensure appropriate building height in relation to street width in order to retain a human scale and to create a sense of enclosure. Setbacks and projections at upper floor can both support and detract from the public realm. Development proposals should look to provide increased heights, where they are situated within appropriate locations, and it can be demonstrated that they facilitate the creation of a coherent pattern of development"</p>	<p>No change – the guidance is considered appropriate in line with existing policy requirements in the Local Plan and London Plan. The SPD is consistent with the NPPF and statutory requirements.</p>
	<p>In addition, it is considered that the accompanying narrative provided within paragraphs 5.18 to 5.23 are too restrictive and would unnecessarily limit development that can be delivered within Bromley (including its urban centres, such as Bromley town centre).</p>	<p>No change - paragraphs 5.18-5.22 set out best practice and widely used design principles for scale and massing. Paragraph 5.23 provides a very brief overview of the predominate character/urban typology found in Bromley. It does not preclude variations in scale (where conditions allow).</p>
	<p>DG4 – The Council should encourage the development of tall buildings on highly sustainable brownfield sites, with good public transportation links, as is the case with the High Street. Wording suggested to encourage the development of tall buildings where appropriate.</p>	<p>No change - Identifying suitable specific locations for tall buildings would be introducing new policy and is beyond the scope of the SPD. London Plan policies D3 and D9 and Local Plan policy 47 set out the requirements and guidance for tall buildings.</p>
	<p>In addition, amendments are required to the supporting text at paragraph 5.31. As currently prepared, it suggests that all new developments need to present views analysis as part of their application submission. Clarification is required here, and the paragraph should be amended as follows: "All planning applications for tall buildings are required to consider the impact on the setting including key views and heritage assets. Immediate, mid-range, and long range-range views should be carefully considered and included within a comprehensive Heritage and Townscape Visual Impact Assessment."</p>	<p>Change – An amendment has been made to clarify that this paragraph relates to tall building proposals.</p>
<p>Environment Agency</p>	<p>The Environment Agency welcome the draft Design Guide SPD. They feel it could be strengthened further with the following amendments.</p>	<p>No change – comment noted.</p>
	<p>Reference should be made to the pre-planning advice services offered by other statutory bodies, including ourselves. Please see suggested wording below, to be included as a new paragraph after section 2.22. "Where relevant, applicants are expected to engage at the pre-planning stage with the appropriate statutory bodies, such as the Environment Agency, Natural England and Historic England".</p>	<p>Change – the Council agrees that early advice from statutory bodies such as the EA can help to improve the quality of applications. Reference to pre-planning advice services offered by other statutory bodies has been added to section 2.</p>
	<p>We are pleased to see that paragraph 4.48 recognises that the most successful places are adaptable to environmental change. Our latest Adaptation report, Living Better with a Changing Climate, shows that England will inevitably face significant climate impacts, and that early action is essential.</p>	<p>No change – support noted.</p>
	<p>DG4: Tall Buildings – We are pleased to see that this Design Guide principal recognises that consideration should be given to the overshadowing impacts of tall buildings. Tall buildings in the river corridor can have adverse impacts of the ecology of the aquatic environment by preventing sufficient sunlight entering the ecosystem.</p>	<p>No change – support noted.</p>
	<p>We recommend the "Siting and design" section (5.109 page 85) for commercial buildings is updated to include a point on Waste Management infrastructure to ensure waste management sites are designed and operated to high environmental standards and also have the right permits and exemptions in place to prevent environmental issues. Suggested wording provided.</p>	<p>Change - The document has been revised to include a new paragraph to reflect suggested wording. Some of the suggested wording is already covered elsewhere in the SPD.</p>
	<p>DG10: Public realm - We welcome the promoting of public green space and the acknowledgement of its multifunctional uses, more specifically, it's ecological purpose as a drainage area.</p>	<p>No change – support noted.</p>
	<p>DG13: Open green space - Bromley is a highly urbanised area meaning we welcome the plans to increase the access to open green space within the borough.</p>	<p>No change – comment noted.</p>

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	<p>It is important that green space has an appropriate design in relation to its function, especially regarding potential drainage and flood issues. It is important that any new proposed green spaces consider its impact on the community of the surrounding area from an environmental perspective, as well as socially and economically.</p>	
	<p>DG17: Sustainable design - We support the incorporation of Sustainable Drainage Systems (SuDS) within a highly urbanised setting, such as Bromley. Their ability to closely mimic natural drainage systems will improve Bromley's resilience against potential flood risk. The highly culverted sections of the River Ravensbourne means the catchment may be susceptible to flash flooding in areas of a more open river corridor. SuDs can reduce this risk if used effectively.</p> <p>Developments located within areas at risk of flooding should comply with Bromley's Strategic Flood Risk Advice (SFRA).</p> <p>We would like to draw attention to the potential risks to groundwater posed by SuDS. Much of Bromley is underlain by important aquifers and lies within Source Protection Zones for public water abstractions. Any new proposals should ensure the appropriate protection of groundwater supplies.</p> <p>It is also worth noting that any major developments proposed without a connection to a sewage main will be objected. The sustainable development of large proposals is vital to the protection of groundwater and referencing this within the urban design guide will help in stressing the importance of this.</p>	<p>Change – the Council acknowledges the importance of issues relating to flood risk. The points raised are covered by policies in the Local Plan and London Plan; relevant policy references have added to DG17</p>
	<p>Where the plans references “enhancing biodiversity” or “enhancing the environment”, we recommend that the following terms are used instead:</p> <p><u>Biodiversity Net Gain</u></p> <p>Biodiversity Net Gain (BNG) is defined as an approach to development and/or land management, that seeks to leave biodiversity in a measurably better state than it was beforehand.</p> <p>The use of this terms makes it clearer that the guidance is referring to a quantifiable increase in biodiversity, in line with the requirements of the Environment Bill.</p> <p><u>Environmental Net Gain</u></p> <p>Environmental Net Gain (ENG) is an approach that aims to leave both biodiversity and the wider environment in a measurably better state than prior to development.</p> <p>This could for example include air quality, water quality, flood protection, recreation, water resources, climate change, waste as well as biodiversity.</p> <p>The aspiration for new development to achieve environmental net gain is outlined in the Government's 25 Year Environment Plan.</p> <p>The above terms should be used as appropriate in paragraphs 2.252, 2.255, 2.258, 4.46 and DG11 (d).</p>	<p>Change – the Council recognises the importance of biodiversity. The document has been revised to include a new section on Biodiversity, including reference to BNG.</p> <p>The concept of environmental net gain does not have the same statutory footing as BNG, hence it is not considered appropriate to reference in the SPD at this time. The principles behind environmental net gain are covered in the Development Plan and in various parts of the SPD.</p>
Landowner	<p><u>Section 2 – Policy Framework and Planning Application Process</u></p> <p>The Draft SPD should note that various matters are capable of being material considerations and a balanced judgement is required to determine the level of weight to be given to each consideration, considered against the significant public benefits expected to arise from a scheme, in the context of relevant national, regional and local planning policies and guidance.</p>	<p>No change - The SPD sets out the key policy framework in section 2. It is not appropriate to list all potential material considerations, or to repeat the provisions of S38(6) in the SPD.</p>
	<p><u>Section 3 – Character Appraisal - Understanding Bromley</u></p>	<p>No change – comment noted.</p>

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	<p>The 1 Westmoreland Road site falls into Bromley Town Centre in the Borough Places Map. We have no specific comments on the description of the character of Bromley Town Centre in the Draft SPD. We welcome the acknowledgement that it is the largest town centre in the borough and is a designated Metropolitan Town Centre, offering a range of retail, leisure, cultural, office and residential provision.</p>	
	<p><u>Section 4 – Principles of Good Design</u></p> <p>We agree with the acknowledgement of the NPPF (2021) and the National Design Guide (2021) in terms of setting out the characteristics of successful places, however we consider there is no specific need to refer to the By Design document (DETR/CABE, 2000) given the age of this document and that CABE are no longer a public body of the Government (having been merged with Design Council, a registered charity).</p>	<p>No change – The DETR/CABE document is considered to be a relevant reference point to inform the guidance in the SPD. Paragraph 4.8 references the document to demonstrate the evolution of the characteristics, which are largely unchanged in extant national policy and guidance.</p>
	<p>DG1 – No specific comments.</p>	<p>No change – comment noted.</p>
	<p>DG2 – Remove ‘decisively’ from DG2 as it is not reflective of the wording set out in the NPPF or Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>Change – the Council acknowledges that the wording of DG2 needs some clarification in line with the NPPF. The wording has been amended in response to these comments (and comments from Historic England and others).</p>
	<p>DG2 - We request Criteria E is amended as follows (new wording underlined) to ensure the most appropriate form of development can be delivered taking into account and balancing all relevant policies and material considerations.</p> <p>e: Ensure that interventions involving listed buildings/structures/landscapes do not prejudice, <u>where possible</u>, alternative solutions in the future by adopting a flexible, adaptable, reversible and sustainable architectural approach.</p>	<p>Change - DG2(e) uses a widely recognised sustainable (architectural) approach to reusing/repurposing buildings, including buildings that might be/are considered to be a heritage asset. A minor amendment has been made to require ‘where feasible’, recognising that there might be circumstances where this approach is not possible.</p>
	<p>DG3 - We request Criteria A is amended as follows (amended wording underlined) to ensure the most appropriate form of development can be delivered taking into account and balancing all relevant policies and material considerations, including the need to optimise the development potential of sites which may result in a change to the existing urban grain.</p> <p>DG3.a: Be consistent with, and appropriate to, the existing urban grain. Existing fine grain and narrow plot widths should be respected and maintained wherever possible.</p>	<p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p>
	<p>DG4: Tall Buildings, DG5: Materials and Detailing, DG6: Housing Design, DG7: Mixed-use development, DG8: Non-residential development, DG9: Shopfront Design, DG10: Public Realm, and DG11: Movement and Legibility – no specific comments</p>	<p>No change – comment noted.</p>
	<p>DG12 - We request Criteria B is amended as follows (amended wording underlined) to provide clarity on the standards to be applied with respect to inclusive access.</p> <p>DG12.b: Using best practice relevant Local Plan and London Plan standards and design guidance to inform inclusive design principles</p>	<p>No change - Section 2 sets out the relevant policy framework. The reference to best practice is a general reference to cover standards/guidance that might be relevant (on a case by case basis) for certain aspects of inclusive design.</p>
	<p>DG13 – We request Criteria A is amended as in its current form it is seeking to introduce new policy requirement for the delivery of open space which is not reflected in the development plan for LBB.</p> <p>Neither the London Plan nor LBB’s Local Plan sets a prescriptive numerical requirement for new open green space to be delivered by schemes. London Plan Policy G4 states “development proposals should where possible create areas of publicly accessible open space, particularly in areas of deficiency” (our emphasis). Local Plan Policy 59 states “the Council will seek, where opportunities arise and finance permits, to secure improvements in the amount and distribution of, and access to, open space in areas of deficiency identified by the Council” (our emphasis). The wording of these policies is clearly expressed as an aspiration/target and not an explicit requirement for new open green space.</p>	<p>Change - Development Plan policy is clear about requirements for new open green space, but the Council recognises that criterion A does suggest going beyond policy requirements. The SPD has been amended to clarify that new open green space should <u>seek to</u> exceed the minimum spatial and qualitative requirements.</p>

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	<p>Para 1.13. of the Draft SPD is clear that the SPD provides guidance on the interpretation of adopted planning policies as they relate to various aspects of design; it does not set out new planning policy, as this cannot be done in an SPD. There is no policy requirement for delivery of new open green space, and no spatial and qualitative requirements specified by policy, and therefore the Draft SPD should not seek delivery of such spaces.</p> <p>We therefore request Criteria A is amended as follows (amended wording underlined).</p> <p>DG13.a: ...where development is in an area already identified as having limited access to open green space, explore the possibility of providing the provision for any new open green space should exceed the minimum spatial and qualitative requirements.</p> <p>DG14 – The supporting text refers to public use/activities and communal (not public) use/activities, however the guidance wording does not offer a definition of ‘communal amenity’ and whether this must include public access. There is no policy requirement for all schemes to deliver public spaces/uses or secure public access. We therefore request the guidance is amended as follows to reflect this (amended wording underlined):</p> <p>DG14: All development proposals should contribute towards improving community amenity (<u>communal, public, or both</u>) by...</p> <p>DG15: Healthy Homes, DG16: Healthy Streets, and DG17: Sustainable Design - no specific comments.</p>	<p>No change – the existing wording is considered appropriate to cover all requirements.</p> <p>No change – comment noted.</p>
Local Group	Generally supportive highlighting one specific issue about bird nest sites - no reference to the use of swift bricks in new development.	Change – The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance
GLA	<p>GLA welcome the Urban Design SPD. They feel it could be strengthened further with further amendments. The draft Urban Design Guide could make specific reference to aspects of the London Plan which specifically reference Bromley. These include the Bromley Opportunity Area, and the Bakerloo Line Extension Growth Corridor.</p> <p>Revise the map in on P12 of the document (Figure 2). This is key to understanding the arrangement of the 21 places in the borough but is not legible.</p> <p>The characteristics of successful places on P26 is a long list from multiple sources with a lot of repetition of themes, albeit differently worded. A more succinct list could be considered.</p> <p>The current wording of section 4.17 ‘assessing good design’ implies that the 6 design principles have already been described; however, they are further on in the doc. Consider re-ordering, so this section (4.17) is after the Design Principles section i.e. after 4.48.</p> <p>Pg 6, para 2.15, point 3 – Should this include the word ‘inclusive’ too?</p> <p>Pg 7, para 2.17 ‘Policy 48’ text should be a new paragraph</p> <p>Pg 11, para 3.25 ‘The 21 borough places originate...’ would read better as ‘There are 21 borough places which originate...’</p> <p>Pg 42, fig 11 Unclear of meaning of reference to ‘vertical streets’ in description</p> <p>Pg 52 LP policy D12 relevant also</p>	<p>Change - a reference to the opportunity area has been added but reference to Bakerloo line is not considered appropriate.</p> <p>Change - an updated places map has been included.</p> <p>No change – the current wording is considered appropriate.</p> <p>No change – the document layout is considered appropriate.</p> <p>No change - Paragraph 2.15 reflects the Local Plan objectives. The importance of inclusive design is evident throughout the SPD.</p> <p>No change – a new paragraph is not necessary.</p> <p>Change – the wording has been amended to better explain the role of the 21 ‘places’.</p> <p>Change – an amendment has been made to provide clarity.</p> <p>Change – a reference to the policy has been added to DG12.</p>

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	Pg 64 'Openings' section: although overheating risk is mentioned, photographic examples indicating mitigation measures (such as decorative grilles, louvres, adjustable solar shading etc) alongside the glazed openings are not currently included in the photographic examples. These would be helpful.	No change – while the Council acknowledges the point being made, there are many factors that contribute to a building/room overheating and it is not necessary to include visual representation of every example.
	Pg 72 LP policy GG4 not relevant	Change - amendment made to remove reference to GG4.
	Pg 75, fig 39 Photographic example appears to show a gated development; LP policy D6 advocates social inclusion and discourages gated development unless unavoidable. A different example photo would be preferable.	No change – The image was chosen to represent a particular housing typology (terraces). The development is not a gated development; the gates enclose a private courtyard framed by a perimeter block of houses and flats fronting the street.
	Pg 77, fig 42 The large green roofed single story structure in the foreground of the example photo is not described at all. Is this home working space at the end of the gardens? Or residential accommodation?	Change – an amendment has been made to clarify that the structures are garden rooms.
	Pg 78 LP policy GG4 is relevant	Change - a reference to GG4 has been added to the relevant policy section of DG6.
	Pg 81, fig 45 The image chosen does not depict a strong sense of place and identity, or show how the different uses manifest and integrate on the site. Is there a different image of the development that might show these better?	Change – It is difficult for one single image to depict every aspect of good design. The image/example is used to raise awareness/draw the user's attention to Flimwell Park, which is considered to be a good precedent to inform the design of mixed-use developments.
	Pg 83 LP policies E5, E8 and E9 relevant too	Change – references to policies E8 and E9 have been added to the relevant policy section of DG7. E5 is not considered appropriate in this section, but is referenced in DG8.
	Pg 87, fig 47 "Re: Green walls: Please add a reference/foot note re: fire safety, and the need to for a development's fire strategy to ensure that facade treatments do not increase risk"	Change - a reference to London Plan policy D12 on Fire safety has been included in the relevant policy section of DG5.
	Pg 89 LP policies E8 and E9 relevant too	Change – a reference to policies E8 and E9 has been added to DG8.
	Pg 116 LP policies G1, G5, G6 and G7 are relevant too	Change – a reference to these policies has been added to DG10.
	Pg 122, para 5.196 It would be good to emphasize that streets are part of public realm by including examples of play on the way and also green and blue infrastructure in this section too. (it is noted that examples are given in other sections)	No change – the Council acknowledges the importance of these aspects of public realm, but notes that this section is called "Streets as Places". There are references elsewhere in the SPD to these aspects, e.g. DG11 recognises the dual purpose of streets.
	Pg 125 LP policy G1 relevant	Change – a reference to policy G1 has been added to DG11.
	Pg 133 LP policy G9 relevant	Change – a reference to policy G9 has been added to DG13.
	Pg 135 LP policy G7 relevant	Change – a reference to policy G7 has been added to DG14.
	Pg 138 LP policies SI 1, SI 2, SI 4 and SI 6 are relevant	Change – a reference to these policies has been added to DG15.
	Pg 148, para 5.261 and fig 94 "Re: Green walls: Please add a reference/foot note re: fire safety, and the need to for a development's fire strategy to ensure that facade treatments do not increase risk"	Change - a reference to London Plan policy D12 on Fire safety has been included in the relevant policy section of DG5.
London Parks and Gardens	<p>DG1 - While the Trust welcomes the requirement that development proposals should respect the setting and character of the environs (DG1c); we suggest that more precise language be used to reduce the risk of misinterpretation. The following wording is suggested:</p> <p>c) Preserving and enhancing the positive aspects of Bromley's unique character by referencing and taking cues from the surrounding context to inform an appropriate architectural language which is sympathetic and</p>	No change – the criterion is considered sufficiently clear.

Respondent	Consultation response	How has response been addressed?
	<p>responsive to the existing or emerging context setting. The introduction of new building forms may be appropriate in areas which have an inconsistent character or limited qualities in order to create a more positive identity where this may enhance or improve the coherence of a character area.</p>	
	<p>Paragraph 5.9 - We welcome the statement in paragraph 5.9 that ‘understanding and responding to the historic environment is key to creating successful and sustainable places.’ However, we would recommend that the following sentence be removed:</p> <p>‘Achieving the right balance between conservation and development requires careful management in order to enable rather than preclude opportunities for positive change.’</p> <p>The correct approach to balancing conservation and development is set out clearly in the NPPF, Chapter 16, where it is discussed in the specific context of ‘proportionality’ and ‘public benefit’. It is our opinion that this section of the SPD should be concerned only with how developments should conserve and enhance the historic environment. However, if balance between conservation and development is to be addressed in this section, we would recommend that readers be signposted to the existing policies where the established approach is set out in detail.</p>	<p>Change – a minor amendment has been made to remove reference to ‘rather than preclude’ to avoid misinterpretation. Relevant NPPF policies are signposted in DG2.</p>
	<p>Paragraph 5.10 - We welcome the reference to conservation areas, statutorily and locally listed buildings in paragraph 5.10. We would recommend this paragraph be expanded to include the historic open spaces. Alongside several Registered Parks and Gardens, the LPG Inventory provides a list of other historic open spaces which could be referenced here.</p>	<p>Change - Reference to Registered Parks and Gardens has been added to paragraph 5.10.</p>
	<p>Paragraph 5.11 – LPG welcomes the statement in paragraph 5.11 that ‘applicants should provide a detailed Heritage Statement describing the significance of any heritage assets impacted by development proposals, including the contribution made to their setting. The level of detail should be proportionate to the assets’ importance for an informed assessment to be made.’ In accordance with paragraph 195 of the NPPF we would suggest that this paragraph also include the requirement for applicants to ‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.’</p>	<p>Change - This requirement is set out in DG2. Further details on heritage statement requirements are set out in the Council’s validation requirements, referenced in section 2.</p>
	<p>DG2 - The wording of the introduction to this policy risks mis-construing the NPPF guidance on justifying harm and loss to heritage assets. ‘All development proposals should seek to preserve and enhance existing heritage assets unless it can be demonstrated that the wider public benefits decisively outweigh any harm or loss.’</p> <p>We recommend this be re-worded as follows: ‘All development proposals should seek to preserve and enhance existing heritage assets. Harm or loss may only be justified where detrimental impacts are outweighed by wider public benefits, in accordance with paragraphs 199 – 202 of the National Planning Policy Framework.’</p>	<p>Change – the Council acknowledges that the wording of DG2 needs some clarification in line with the NPPF. The wording has been amended in response to these comments (and comments from Historic England and others).</p>
	<p>DG2 – We recommend that point a), which requires proposals to ‘demonstrate an understanding of the significance of heritage assets [...] including their evidential, historical, aesthetic and communal value’, signpost the reader to English Heritage’s Conservation Principles, Policies and Guidance, where further information on assessing significance is given.</p>	<p>Change - General reference to Historic England advice and guidance notes has been added to section 2.</p>
	<p>DG4 – Overall LPG welcomes the discussion of taller buildings in paragraphs 5.24 to 5.34. We note however that within Policy DG4 there is no specific reference to the impact of tall buildings on the settings of heritage assets and open spaces more generally. We recommend that point a) be expanded to read</p> <p>[All development proposals should] consider the visual, functional, environmental, and cumulative impact on both the immediate setting and the wider surrounding context in accordance with Policy D9 of the London Plan (March 2021). <i>Proposals should take account of, and avoid harm to, the setting of heritage assets</i></p>	<p>Change – the Council agrees that these points are important considerations but notes that they are already covered under criterion a: visual, functional and environmental considerations (as required by London Plan policy D9)</p>

Respondent	Consultation response	How has response been addressed?
	<p><i>including registered parks and gardens and other noted historic landscapes as defined by your Open Green Spaces policy.</i></p> <p>Paragraph 5.219 - LPG welcomes the inclusion of paragraphs 5.218 - 5.220 on Open Green Spaces, particularly the reference to the range of spaces including leisure gardens and allotments, sports facilities, playgrounds, cemeteries, churchyards and woodland as well as formal parks. We recommend that a reference to the LPG inventory is included here to give further information on the public space currently available in the borough.</p> <p>We recommend however that paragraph 5.219 is amended to state that 'the borough also contains areas where the provision of and access to open green space falls below acceptable levels'. The current wording, which says that provision of access in areas of deficiency 'could be improved' does not accord with the urgency afforded to Open Space Deficiency in the London Plan, policy G4.</p>	<p>Change – the Council welcomes the LPG inventory appended to the consultation response but considers that reference to LPG inventory is not necessary within the SPD. Various Development Plan policies will apply relating to open spaces on this inventory.</p> <p>The wording re: open space deficiency is consistent with wording of Local Plan policy 59, therefore n amendment is not considered necessary.</p>
Planning consultancy	<p>Respondent is broadly supportive of the guidance contained within the Council's Draft Urban Design SPD. However, in the context of the Council's poor housing land supply any guidance provided to support the Council's planning policies should ensure that it does not limit the opportunities for sites in sustainable locations to deliver an enhanced built form that offers a suitable range of uses, including the delivery of new homes.</p> <p>The following wording should be added to DG1: "Proposals which introduce additional height and massing and which contribute positively to the Borough's housing stock should be supported where good design is used and where new buildings are demonstrated to be acceptable in planning terms."</p> <p>We support the principles of DG3, however, we would suggest that additional text should be included as follows: "Buildings promoting additional height (versus existing height), whether through extension or redevelopment, will be considered acceptable where an assessment has been conducted and it has been demonstrated that they can facilitate the creation of a coherent pattern of development, and demonstrate sustainable development in accordance with NPPF."</p> <p>Given the context of the Council's housing land supply which at the time of writing is well below the 5 year requirement, the Council should encourage well-designed tall buildings that are sustainable, and which can assist the Council in meeting housing demand. Specifically, the Council should encourage the development of tall buildings on sustainable brownfield sites, with good public transportation links, as is the case with Elmfield Road. In this context, it is suggested that the following wording is included within the SPD to encourage the development of tall buildings where appropriate: "Re-development of brownfield sites within the town centre which include tall buildings will be supported where sustainable intensification of use can be demonstrated to help meet unmet housing supply within the Borough."</p> <p>Whilst it is acknowledged that Elmfield Road is located within a Business Improvement Area, as noted above, the SPD should actively encourage development proposals that offer the provision of residential dwellings to meet unmet supply, where they demonstrate that there is no net loss of business floorspace. On this basis, we propose the following text is added to DG7: "Mixed-use development, which includes residential uses, should be supported where the uses proposed are compatible with one another, well designed and where they contribute positively to the Borough's housing stock."</p>	<p>No change - The SPD is a positive document which sets out design guidance applicable to planning applications in the borough. The Council considers that the SPD will not unduly restrict development, or add unnecessarily to the financial burdens on development, as the SPD adds further guidance to existing policy.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p>
Bromley Liberal Democrats	<p>Respondent recognises the Urban Design Supplementary Planning Document as a key component in the execution of the Bromley Local Plan and acknowledges the significant amount of work and detailed research which has been undertaken in order to produce such a comprehensive guidance to the application of good urban design within Bromley and its relevance to complementary national/regional/local policy guidance.</p> <p>Respondent would like it made clear in the document that any new developments must mirror or extend the design and style that already exists rather than trying to create a separate identity in an individual development. We feel that the current look in Bromley Town, particularly near Bromley South, is an example</p>	<p>No change – comments noted. The Council agrees that local identity is an important consideration. The SPD already sets out detailed design guidance which, inter alia, sets out the importance of local identity.</p>

Respondent	Consultation response	How has response been addressed?
	of a lack of cohesiveness of design, with the supposedly iconic St Marks Square failing to form part or become part of Bromley's identity. The same can be said of Perigon Heights – two very high buildings that do not reflect any part of the existing character of this part of the town and fail even to complement each other.	
	<p>The assessment of development proposals against the three broad principles of connection, contribution and clarity will, we feel, provide architects and design with a good starting point to inform their design process. We particularly support the 'people first' approach as set out in item 4.18</p> <p>Section could be strengthened to underline that designs must be focussed on the needs and wishes of people who live and work in Bromley. Accessibility of all amenities should be a fundamental basis for all designs.</p>	No change – the reference to a 'people-first' approach is considered sufficient to address the point raised.
	Comments on the six overarching principles. Agree with context and inclusive. Agree with responsive but consider that 'experience' should be sympathetic to existing local vernacular as stated in para 4.29. Agree with connected but would like to see a stronger commitment to giving priority to pedestrians. Agree with healthy, support the practice of Health Impact Assessments being undertaken as early as possible in the design process in order to maximise potential health gains and to address health inequalities. Agree with sustainable, particularly the integration of green infrastructure into the design of commercial and public realm	No change - Support for several principles is noted. The suggested reference to 'experience' being sympathetic to local vernacular is not considered appropriate, as experience is not just informed by aesthetics, it is a broader consideration. Guidance throughout the SPD promotes pedestrian movement as well as other forms of sustainable transport.
	DG2 - Should be a stronger defence of Bromley's heritage in these paragraphs, including a compulsory consultation with heritage organisations, e.g. English Heritage, Bromley Civic Society and other organisations with a guardianship role or interest in these assets.	Change – the Council supports early engagement with relevant heritage organisations, but the SPD cannot mandate consultation. Reference to Historic England advice and guidance notes has been added to section 2.
	There should be a restatement in this section that tall buildings must mirror or extend the design and style that already exists rather than try to create yet another idiosyncratic look. There should be an acknowledgement that the height of these buildings should be lower than certain iconic buildings already in place, e.g. 2 or 3 storeys lower than the Churchill Theatre in Bromley Town, 2 or 3 storeys lower than Bromley College in Orpington.	No change – the suggested amendments are considered too prescriptive for a general design guide, and would constitute new policy in any event. The guidance on tall buildings would ensure that a variety of important considerations are taken into account when assessing tall building applications.
	We would also like to see mention of loss of light and loss of privacy to nearby residential units when high buildings are designed, particularly in relation to balconies.	No change – the Council agrees that these issues are important considerations, and notes that these points are already covered in DG4, through reference to London Plan policy D9. Guidance on balconies is also provided elsewhere in the SPD.
	Materials and Detailing – there should be specific mention of the need to prove the effect of ageing and weathering of materials used (the example of the poor ageing of the metal façade on St Marks Square is relevant here)	No change - the Council agrees that consideration of potential weathering is important, and notes that The SPD already includes sufficient reference to weathering, in the materials section, including in DG5.
	Inclusive Design – as stated we'd like accessibility to be a key part of any design. DG12 covers many important aspects but we'd like specific reference to provision of public toilets (a limiting factor to both young and old when considering accessibility) and weatherproof areas of the public realm.	No change - The London Plan includes policy re: provision of public toilets, it is not necessary to repeat this. The SPD guidance on public realm includes references to shade and shelter.
	Open Green Spaces – Support the need for all proposals to contribute towards improving access to green spaces for all. But would like to see specific reference to areas that can be used for sporting activities.	No change – the Council agrees that open spaces should be multi-functional where appropriate. The SPD already references the need to consider different activities as part of open space design, including sports uses.
	<p>Healthy Streets – we support the requirement for all developments to help create healthy streets and spaces.</p> <p>We would like to see an emphasis on "pedestrian first". We support the need for identifying pedestrian/cycle paths but would like to see an ambition for a completely joined-up approach to cycleways, where new cycleways form part of a borough wide network of cycleways that identifies priority routes to schools, community centres transport hubs and shopping centres.</p>	No change – the SPD supports sustainable transport but does not identify specific schemes; this is not within the remit of the document.

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	Sustainable Design – We would like to see an emphasis on the retention, refurbishment and reuse of older buildings, especially where they form part of the historic identity of the town. There needs to be overwhelming reasons for demolishing a building and building new – the arguments in favour of refurbishing buildings need to be addressed.	Change – the SPD has been amended to include further reference to circular economy. Existing wording already reflects importance of heritage assets and local identity.
Local group	Respondent acknowledges that much of the guide is positive, but they are concerned that the images/examples of buildings used in the SPD are brutalist and ugly, and would be "totally out of keeping" [in Bromley].	No change - The images used in the document are considered appropriate. They illustrate the principle/s highlighted in the guidance notes and supporting text. They are award winning schemes and widely recognised as good examples of high-quality design.
Individual	In Assessing 'good design' (and the overarching principles), 4.17. I would like to see the removal of 'Emerging', as this will allow justification of any cheap concrete & glass block, as it is paving the way for a new local and emerging context, namely itself.	No change - Emerging is a relevant term and does not mean that any new building will automatically be the key reference point for further development. The guidance in the SPD will help to ensure that new development is appropriate for its context.
	In 4.27 it says, "Historically the juxtaposition of new buildings and spaces alongside the existing urban fabric demonstrates how traditional character and innovative design can coexist; with local identity highlighted rather than eroded by new interventions." I would like this removed, as it is simply not true. The chair of the Civic Society has a quote from an eminent town planner, that the existing "juxtaposition" of the Brutalist buildings on the high street is the worst example of blighting a High Street in the country. Including this would justify dreadful new buildings like the Owen Luder TopShop/Burtons building. Instead, it should include the principle that new developments on or close to the High Street should be 'Human Scaled', so that design elements such as cupolas and domes should be reused from heritage buildings.	No change - Paragraph 4.27 should be read in the context of the SPD's six core design principles and should not be read in isolation. The Responsive and Contextual principles encourage new buildings and spaces to be sympathetic in scale and character. Human scale is referenced in DG3.
	Suggested we include a new core design principle to ensure, where development is in (or close to) a conservation area, the local design elements are incorporated into the building design. This is to make new developments identifiably 'Bromley' (or whichever neighbourhood it is) rather than a building that could be anywhere in the UK. And 'seeking reference' is NOT good enough; have seen enough architect's drawings to know that incorporating these heritage design elements is done with great reluctance.	No change – the Council recognises the importance of preserving and enhancing heritage assets and protecting local identity, e.g. in the Contextual and Responsive principles and guidance notes DG1, DG2, DG3, DG5, DG6 and DG9. which is reflected in the specific guidance note DG2. However, a separate overarching principle would be unsuitable and unnecessary; the document needs to be read as a whole not in isolation.
	The illustrations deserve very careful curation: the choice of these will have a considerable input into what architects think will be acceptable. The current ones seem to be chopped out of some architectural journal. They ignore good local examples and incorporate no heritage design elements at all. As architects in the town centre, have proved very reluctant to use heritage design elements, they definitely need to be in the examples. In short, as residents, we 'don't want to look at buildings like these for the next 50 years. Respondent provides comments on good illustrations and several illustrations that should be replaced as they are either too tall, ignore good local examples, are bad examples of human scale or ignore local heritage and go cheap.	No change - The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The precedent images are not advocating the exact scheme being developed in Bromley, nor do they suggest such schemes would get permission if proposed. The SPD sets out extensive design guidance that applies as a whole to new development. Respondent put forward several local examples for precedent images, but they were considered inappropriate, were not the requisite quality and did not represent the principles that the precedent image was intended to convey.
Local group	Good to see 'biodiversity' and 'ecosystem services' mentioned in the draft Bromley Urban Design Guide SPD but they merit greater emphasis in this document.	Change - A new sub-section on biodiversity has been added to the 'Sustainable' principle section, to address these and other comments relating to biodiversity.
	Charles Darwin lived in Downe for 40 years from 1842 until his death in 1882. He studied, observed and experimented on local plants and animals. These studies were incorporated into his books and articles including 'On the Origin of Species by Means of Natural Selection' (1859). The areas where he studied still remain much as he described them and continue to support many of the species he studied here. They are	No change – These points are not considered relevant to the character appraisal or elsewhere in the SPD.

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	therefore of great local, national and international importance educationally for visitors from local young children to international scientists. Cudham and Downe Valleys, Keston Common and Holwood need protection from development which would detract from the Darwin story and need to be incorporated into Section 3 Character Appraisal, possibly under the section Darwin & Green Belt Settlements (3.71-3.73) and referred to within Policy DG1	
	Reflective materials should be avoided in building design. This should be added to paragraph 5.56 which states, 'The choice of materials should also be influenced by the wider environmental impacts'	No change – the Council agrees that reflective material needs to be considered carefully. The SPD already includes reference to reflective material; additional reference is considered unnecessary.
	Consideration should be given to the installation of integrated bird and bat boxes in appropriate areas	Change – Support for the SPD is noted. The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance, including a new guidance note to summarise the section.
	Under Nature 5.170 Line 6, add, 'reduction of pollution'	No change – while reduction of air pollution is an important issue, it is already addressed elsewhere in the SPD.
	Policy DG8 point e, add reference to biodiversity	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	Under Non residential building paragraph 5.115 include mixed native species hedgerow planting. For example, lines 1 & 2 'including tree and mixed native species hedge planting to screen plant facilities and service yards, and reduce the need for unsightly security fencing.'	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	DG10 – Suggest adding 'and create Nature Recovery Networks bringing the countryside into the town' so it reads, 'Incorporate green infrastructure (trees, planting, SUDs) to help mitigate environmental conditions and create Nature Recovery Networks bringing the countryside into the town. Consider microclimate effects (influenced by layout, orientation, and scale of buildings) in order to create a comfortable environment which encourages rather than deters use of the space(s)'	No change – the SPD already includes reference to NRN; further amendment is considered unnecessary.
	DG11 Add in the importance of including native species for 'Nature Recovery Networks' and increasing ecosystem services. Bringing the countryside into the town.	No change – the SPD already includes reference to NRN; further amendment is considered unnecessary.
	Under 'Healthy' paragraph 5.220 point 1. Boundaries should be mixed native species hedging wherever possible as these support biodiversity.	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	DG13: Open Green Space. Emphasise importance of native species as these support biodiversity Nature Recovery Networks and bringing the countryside into the town (mental health).	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	DG14: Community Amenity. Emphasise importance of using native species as these support biodiversity and Nature Recovery Networks.	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.

Respondent	Consultation response	How has response been addressed?
	DG16: Healthy Streets need trees and shrubs to reduce air pollution and for urban cooling. These should include many native species to support biodiversity too. Healthy Streets can also bring countryside into town, good for mental health.	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the ‘Sustainable’ principle section.
Local group	Respondent welcomes the aims set out in the SPD and make several suggested changes/rewordings to improve/strengthen those aims. The longevity and purpose of the document in a changing policy environment is questioned. A number of comments support various aspects of the document but question whether it can be delivered.	No change – The UDG sets out our aspirations and design requirements and will lead to a higher standard of design and build quality in Bromley.
	What will be the fate of the Urban Design SPD when the Local Plan is replaced?	No change – The role of the SPD is set out in section 1. Upon adoption of the new Local Plan, the SPD will remain a relevant consideration but may require updating to reflect new policies.
	Leafy avenues and a bosky street environment are a key characteristic of suburban Bromley – important in all of the 21 areas	No change – 29h This is reflected in paragraph 3.20.
	Should Local Plan policy 42 (development adjacent to a Conservation Area) be added to ‘relevant guidance’ under DG1 and DG2?	Change - Reference has been added to DG1 and DG2.
	Should ‘can’ be omitted from paragraph 5.7? “Heritage assets DO influence an understanding of place and DO make a contribution to our natural and built environment”	No change – the current wording is considered appropriate, and ensures benefits of heritage assets will be taken into account.
	The word “several” should be replaced with ‘many’ in paragraph 5.10	Change - Amendment made.
	Should reference be made Historic England guidance notes under DG2?	Change - General reference to Historic England advice and guidance notes has been added to section 2.
	Fig 16 p.49 – this diagram needs more explanation. As it stands it meaningless.	No change - The diagram conveys key principles for tall buildings and should be considered in conjunction with other guidance in the SPD, not in isolation.
	The importance of street trees to the distinctive Bromley environment should be recognised.	No change - The SPD guidance sufficiently references the benefits of trees at various points throughout the document.
	General comments on the images and highlight the need for local examples of good design. Group consider it a shame that all the photo examples given are located elsewhere. Are there no good examples of these design principles within the Borough?	No change - The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.
National Highways	NH are satisfied that the SPD would not materially affect the safety, reliability and/or operation of the SRN.	No change – comment noted.
Individual	Please can you add my comments to be looked at before you decided on your new design plan. The designs of any new buildings should fit in with Bromley design already there. Not these urban designs that look out of place, also the designs are way too high. I just read a report by Croydon council, they now want to stop high rise buildings, they have realised they have made a mistake building so many high rise buildings. But I believe its too late for them now. Its not too late for Bromley. 10 storey buildings is enough with these new blocks. Look what happened at Bromley south this year with the fire. Its very hard for the fire brigade to attend and solve quickly, why would you have more of these tower blocks. I wonder who will buy them, I would not want to leave up high.	No change - The SPD provides guidance on tall buildings which relate to the issues raised.

Respondent	Consultation response	How has response been addressed?
Individual	<p>Please state in section 5.170-5.171 (Nature, page 106): "Immature habitats cannot support cavity-nesting birds without artificial nest sites - therefore, to enable access to nature, swift bricks are a universal nest brick for a wide range of small bird species and should be included in accordance with best practice guidance such as that available from CIEEM.</p> <p>Swift bricks have advantages compared to external nest boxes - they last the lifetime of the building, have no maintenance requirements, have good temperature regulation with future climate change in mind, and are aesthetically integrated with the building design." The reason for adding this statement is that immature habitats cannot support nesting birds without artificial nest sites - the upcoming Net Gain for Biodiversity requirement also overlooks cavity-nesting birds which require older buildings or mature trees.</p> <p>Swift bricks meet the needs of nesting birds as they are a universal nest brick for a wide range of small bird species (NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42): https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf</p> <p>The Mayor of London's guide to Urban Greening for Biodiversity Net Gain calls for nest bricks but it is easily missed on the final page of the document: https://www.london.gov.uk/programmes-strategies/urban-greening-biodiversity-net-gain-design-guide</p> <p>The London Plan policy G6 (item B4) calls for artificial nest sites appropriate for an urban context [e.g. swift bricks]: https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021</p> <p>There is a British Standard BS 42021:2022 for Integral nest boxes and this calls for such nest boxes to be swift brick type boxes, to enable a wide range of birds to use them (starling type boxes may cause birds to become trapped within): https://standardsdevelopment.bsigroup.com/projects/2017-03102#/section CIEEM provide best-practice guidance online regarding numbers and location: https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</p> <p>Monitoring data from the Duchy of Cornwall shows the benefits of swift bricks to a wide range of bird species: https://nansledan.com/duchy-nest-brick-project-boosts-endangered-wild-birds/</p> <p>National Planning Policy Guidance (NPPG) 2019 Natural Environment paragraph 023 sets out the wildlife benefits of swift bricks, and also bat boxes and hedgehog highways: https://www.gov.uk/guidance/natural-environment</p>	<p>Change - The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance. A new section on biodiversity has also been included, including reference to biodiversity net gain.</p>
Charity	<p>In section 2.9 - 2.13 on London Policy context, we recommend adding reference to the following: Policy G7 of the new London Plan (2021) states that "Development proposals should ensure that, wherever possible, existing trees of value are retained." https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf.</p> <p>The London Plan guidance on the London Urban Greening Factor places the highest value on semi-natural vegetation (including trees) maintained or established on site. https://www.london.gov.uk/sites/default/files/ugf_-_consultation_version_sept_2021.pdf</p> <p>We welcome the recognition in section 3.20 of the importance of woodlands and street trees to Bromley's character. We recommend that a full tree survey is undertaken to update the Ancient Tree Inventory for Bromley in order to enrich the evidence base for the SPD.</p> <p>Welcome the inclusion of green infrastructure and access to greenspace as part of healthy places (para 4.41). Support the principle of sustainable (4.44-4.48).</p> <p>We support the approach that a comprehensive context appraisal should be undertaken before any design work begins, identifying existing natural assets, including ancient, veteran and notable trees.</p>	<p>Change - Section 2 sets out the broad 'Policy Framework', individual policies are referenced in Section 5 'Design Guidance', policy G7 will be added to DG10 under relevant policy and guidance.</p> <p>Change – An additional paragraph referring to the Urban Greening Factor has been added.</p> <p>No change – the Council recognises the importance of trees, but a full tree survey is not necessary to inform this SPD.</p> <p>No change – support noted.</p> <p>No change – support noted.</p>

Respondent	Consultation response	How has response been addressed?
	<p>We welcome the sections on Landscape and Nature (paras 5.162 - 5.171) including guidance on maximising natural features, and Policy DG 10 particularly section e) on incorporating green infrastructure including trees. We recommend underpinning this with specific targets and requirements, such as setting a tree canopy cover target, and/or adopting an Urban Greening Factor approach. We recommend setting a proposed ratio of tree replacement, where trees are unavoidably lost, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience. These policies will support delivery of the emerging national requirements for Biodiversity Net Gain and Local Nature Recovery Strategies.</p>	<p>Change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review. An additional paragraph referring to the Urban Greening Factor has been added, reflecting the adopted policy in the London Plan.</p>
	<p>Welcome the reference to street trees in DG11 para d). Street trees have multi-functional benefits: they add character, connect habitats, absorb CO2, improve climate resilience, reduce pollution effects and enhance physical and mental well-being.</p>	<p>No change – support noted.</p>
	<p>Strongly welcome the guidance in paras 5.219 and 5.220 on addressing deficiency of access to greenspace and on including natural greenspace in this provision. We support the principle that residential developments should have access to the natural environment, including to woodland. We recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation. Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space: – Of at least two hectares in size, no more than 300m (five minutes' walk) from home. – At least one accessible 20-hectare site within 2km of home. – One accessible 100-hectare site within 5km of home. – One accessible 500-hectare site within 10km of home. – A minimum of one hectare of statutory local nature reserves per 1,000 people. The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that: – That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. – That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.</p>	<p>No change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review. The importance of providing access to nature is highlighted in paragraphs 5.170-5.17, 5.218-5.220 and DG13.</p>
	<p>Strongly welcome the guidance, particularly the sections on Green Infrastructure and Urban Greening. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats. Green infrastructure should be protected, enhanced and integrated into development plans, including through local tree strategies, landscape management plans or urban development briefs. To achieve ongoing benefits, green infrastructure needs to be protected and maintained. CIL allocations for green infrastructure should include management plans and funding for maintenance. Natural green infrastructure is cost-effective: for example, trees cost less to maintain than regularly-mown turf and have wider biodiversity benefits.</p>	<p>No change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review.</p>
	<p>The guidance in the draft SPD is sound. To be effective in practice, it needs to be supported by specific policy requirements and targets, such as a tree canopy cover target, and or urban greening factor metrics. We recommend the Woodland Trust guidance https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/</p>	<p>No change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review.</p>
<p>Local group</p>	<p>Section 1 should refer to Scheduled Ancient Monuments.</p>	<p>Change – the Council agrees that additional references to Scheduled Monuments would be useful. Section 1 introduces the purpose, scope and status of the document, but reference to the Scheduled Monuments consent process has been added to section 2. Specific Scheduled Monuments are also referenced in Section 3 (Character Appraisal).</p>

Respondent	Consultation response	How has response been addressed?
	<p>Paragraph 3.15 mentions that older buildings date back to the 19th and early 20th century, there are a number of listed timber framed buildings by the church which date from the 16th century.</p> <p>Reference should be made to the Roman Baths being a Scheduled Ancient Monument.</p> <p>Paragraph 3.57 should mention that Scadbury Manor is a Scheduled Ancient Monument.</p> <p>Paragraph 3.97: The Priory has elements dating from the 13th century – rather than the 15th century as stated, and the timber framed extension dates from the 16th century – not the 17th century as stated. Reference should be made to the Grade II listed gardens in the grounds of the priory.</p>	<p>Change - The dates and details referenced in paragraphs 3.15, 3.57, and 3.97 have been added to the SPD. General reference to Scheduled Monuments has been added to paragraph 3.27.</p>
	<p>It should be made clear that Heritage Statements should take account of Archaeological Priority Areas and should refer to the guidance on the LBB planning website.</p>	<p>Change - The need for Heritage Statements to take into account Archaeological Priority Areas has been added to paragraph 5.11.</p>
	<p>The word 'identification' should be added before 'retention' in paragraph 5.268.</p>	<p>No change - The wording of paragraph 5.268 is considered to be appropriate within the context of adaptability and resilience.</p>
Individual	<p>The plan to do an Urban Design Guide SPD is great, but this all reads a little like it's just paying lip service to the idea. It doesn't really seem like the author(s) know or care about what makes Bromley a unique or distinctive place. Nor do they demonstrate anything other than a basic understanding of the different areas within Bromley. The Borough Places read a little like they spent 5-minutes researching Bromley via Wikipedia. Far more detail on the character areas is required. Most of the Borough Places are only three to four paragraphs long and very broad-brush. Virtually nothing on architectural or urban characteristics. Nothing on access and movement, Virtually nothing on the history of each area. Nothing on social or economic information, or the experience of living in each area. Why are none of the examples from Bromley?</p>	<p>No change – the Council considers that the SPD provides sufficient detail to convey the varied characteristics of Bromley, relevant to the purpose of the document.</p> <p>The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.</p>
Individual	<p>Large scale new development must not segregate private housing from social/affordable. all residents must be able to use all facilities/amenities. all new development must re-use rain water and have solar/photovoltaic panels.</p>	<p>No change – The SPD promotes tenure blind principles and includes guidance on sustainable design.</p>
Individual	<p>Section 1 – Should the vision state as fact “The Green Belt fulfils its purpose” There is a lack of evidence to support this statement. You fall silent on how the Green Belt could be further scrutinized, boundaries reviewed, and opportunities created.</p>	<p>No change - This repeats the vision from the Local Plan. A review of green belt is outside the remit of an SPD.</p>
	<p>Section 2 - Not with standing the incredible length of time to determine applications in Bromley, the list of validation requirements is substantial and can be viewed as a barrier to encouraging development.</p>	<p>No change – comment noted. These issues are outside the remit of the SPD.</p>
	<p>Section 3 - Too many examples shown appear to be computer generated rather than real world. The document is lacking evidence of positive outcomes in Bromley Borough.</p>	<p>No change - It is assumed that the respondent is referring to the precedent photos in section 5. If so, none of them are CGI.</p> <p>The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.</p> <p>Respondent has not suggested any examples so it is difficult to know what is considered to be a positive outcome.</p>

Respondent	Consultation response	How has response been addressed?
	Section 4 - Good design can be subjective, this document gives no clear guidance to a preferred route in Bromley. Members have historically rejected modern design as being ugly! Planners might support new ideas, but then committees rarely follow officer recommendations on such proposals.	No change - the SPD provides a positive framework to achieve high quality design in the borough.
	Contextual - "Bromley has a strong architectural and cultural heritage with a distinctive character" Please describe distinctive, and explain how the average person would quantify this. Is mish mash is distinctive? Please don't pretend that it is anything more!	No change – Distinctiveness is a well understood terms in the context of planning and design, and is considered appropriate terminology here.
	Responsive – Too many examples of cheaply built, flat fronted plain brick structures claiming to be characterful. Far better examples can be found in other parts of the country.	No change - The images used in the document are considered appropriate. They illustrate the principle/s highlighted in the guidance notes and supporting text. They are award winning schemes and widely recognised as good examples of high-quality design. No specific alternate suggestions were put forward for consideration.
	Connected - "Connected Street Networks" Bromley is mainly a car driver's borough, cul-de-sacs prevent rat runs and speeding, presumably improving road safety and reducing fatalities, and this is why most modern development are built as such.	No change – comment noted.
	Inclusive - Sounds like an ideal utopia, but will it work in practice! Siting successful examples in the borough might help, but none spring to mind.	No change – comment noted.
	Healthy - If you want healthy options, allow the building of houses with gardens where people can exercise and enjoy the outdoors, and option that most people would prefer, not high rise living in tower blocks.	No change - The SPD applies to a wide range of development typologies, including houses with gardens and tall buildings.
	Sustainable - MMC = quick cheap and won't stand the test of time. Many 1970's tower blocks have already been torn down, new homes should be built to last 100 years plus.	No change – the SPD clearly sets out that MMC will be subject to the same level of design scrutiny and quality benchmarks as conventional builds.
	Other comments - I expect this to be railroaded through whilst the real issue of a lack of building over many decades and hundred on the council homelessness list grows and grows whilst lip service is paid these ever more frequent documents that have systematically failed to deliver the right homes in the right places over very many years.	No change – comment noted.