

National Model Design Code Feedback from groups

1. HOW WOULD YOU IMAGINE THE NATIONAL MODEL DESIGN CODE WORKING IN PRACTICE?

Key points: No one-size fits all; Broad principles and national standards e.g. space, room sizes, eco standards; Prompts for detailed codes to address at local level

- The problem for a NMDC is that it could create a one size fits all approach which could well both be out of keeping and damaging to a particular locale. Anything that is 'national' is going to have to be either high-level or so comprehensive to allow for all local situations that it will take years to prepare.
- It would need to cover a basic set of general principles, requesting or requiring recognition of the local vernacular, local materials and compatibility with the local landscape or townscape.
- At national level there should be a recognition of the importance of street patterns and layout, building types, importance of urban fabric, heritage, and that for many people / communities, spaces and places have important social and cultural meanings – i.e. it's not all about the 'brick and mortar'.
- It should lay down certain legal standards – such as room sizes for domestic properties, insulation standards, etc. It might also include requirements for such things as sustainability, eco standards to be applied, adaptability for future use, and accessibility.
- National code should perhaps provide a series of prompts for detailed codes to address at the local level.
- It could not, must not be prescriptive.
- This country is too diverse to be lumbered with compliance to one set of 'rules'. There needs to be room left for appreciation of diversity and a bit of creativity.
- My guess is that it would be used as a default set of principles – but does a code have any teeth and indeed should it?

2. BASED ON YOUR LOCAL EXPERIENCE/AREA, WHICH FORMS OF DEVELOPMENT DO YOU THINK WOULD BE BEST SUITED TO DESIGN CODES?

Key points: In principle, all forms of development since all can potentially contribute to the quality of place-making; Residential; Brownfield sites 'fitting into' the existing urban grain/historic context; Large scale greenfield sites (blank canvas); Development within Conservation Areas.

- particularly those on brownfield sites or sites, where designs need to be respectful of key heritage assets in the vicinity.
Large scale developments – blank canvas
- local codes would be needed for conservation areas to secure their heritage
- The obvious one is residential, but this would need to cover all types and particularly minimum standards for HMOs and office/retail to residential conversions.
- particularly those where multiple uses are envisaged – This approach is perhaps less relevant to single building schemes
- If a design code was based on the above, housing. This already seems to be being done to a national design code without any concern or recognition whatsoever of local diversity. And it looks horrid.
- . The National Design Guide and the NMDC are both almost exclusively about housing. What is therefore needed, and yet only minimally mentioned in the White Paper, is community-led work on character assessment, because that assessment can then be used for any building type proposed. There is guidance available for communities on doing local assessment and we in Place Studio have our own that we have used very successfully (judging by examiner comments and awards) for Neighbourhood Plan groups.

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3. WHAT WILL BE THE BARRIERS TO COMMUNITIES GETTING INVOLVED IN HELPING PREPARED DESIGN CODES AND WHAT WOULD HELP INCREASE PARTICIPATION?

Key points: Conceptual/vision issues are much more difficult to engage with than specific proposals; Time commitment and level of interest, experience and knowledge will act as barriers; Has to be a realistic expectation on both sides (organisers and participants) about people being listened to and having their views debated and that not all views are capable of being delivered. Feedback loop is critical.

- It is much more difficult when the approach is to look at more conceptual/vision issues.
- The time commitment and level of interest, experience and knowledge will act as barriers to involvement of the public
- There must be a realistic expectation on both sides (organisers and participants) about people being listened to and having their views debated – bearing in mind that not *all* views are capable of being delivered.
- Greater use of digital technology and communications could help widen participation.
- lack of time and lack of awareness, and possibly lack of recognition of the value of local knowledge and experience
- Failure of the Local Authority to recognise that in our communities there are professional and experienced people who would willingly be engaged in this.
- Engagement and co-design with the community is therefore appropriate.
- People understand and can appreciate a design of what is intended to be “the finished article” and can critique it accordingly.
- This cannot be rushed and should be at pains to ensure that the usual suspects are not engaged
- I would guess pretty much as now. Civic societies probably provide the most consistent vehicle for engagement and I find that amongst my own society’s members, not everyone wants to sit down and discuss planning matters – they are more than happy to leave it to the committee. However, even among the committee members, it is only a subset that regularly engage in planning issues.
- Participation might be increased by facilitated discussion groups that we able to meet outside standard office hours (whatever those are these days). We used to have a ‘Town Team’ in Wakefield as part of the Urban Renaissance programme and that did bring out quite a lot of people – but over time, interest and commitment dwindles.
- Communities are interested in their surroundings – make it easy for them to provide input. Communities are patronised rather than listened to.
- The present separation and isolation of Planning Depts in LAs are not conducive with working with the community; the levels of bureaucracy and the technical requirements embedded in the planning process will be deterrents. The Localism Act has promoted Neighbourhood Forums where there are not Parish or Town Councils to take that responsibility.
- The article suggests some barriers from the good and the great, especially architects (which is exactly what messed up the Village Design programme in Ireland) and even from some planners. How to increase participation would need a long reply but it is very much about using enjoyable, engaging, even just plain fun methods and, for example, working through schools – my local primary school pupils did part of my own community’s character assessment.

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4. AT EACH STAGE, WHAT ARE THE BEST PROCESSES TO INVOLVE PEOPLE

- **Key points:** Have a range of processes since one size does not fit all; Workshopping (or using virtual tools) is essential and must happen at an early stage (blank sheet ideally) This takes time and effort – needs resource.
- Exhibitions / workshops / digital feedback – various platforms
- Publicity and awareness raising to begin with.
- open meetings and discussion groups at times convenient to the public/interested parties, independent but informed facilitation.
- opportunities to debate and explore ideas; publication of options for further discussion; final selection and scrutiny/
- This all takes time and effort and cannot be rushed.
- It is always tempting to seek consensual views, but these can be conservative and limit innovation. It is better to find out at an early stage the communities' values through consultation (NFs etc.) and then have these embedded within design codes without prescribing the architectural details.
- Give respect where respect is due. Do not treat the 'community' as an uneducated mass. Do not pitch questions in questionnaires which can only lead to one conclusion. Leave room for thinking out of the box. A local authority should be prepared to be challenged and acknowledge that challenge constructively.

5. HOW CAN WE MEASURE COMMUNITY SUPPORT FROM A COMMUNITY ON A DESIGN CODE?

Key points: Support per se is hard to measure, need a mix of approaches appropriate to local area

- Level of engagement in the process of devising the code.
- Fewer objections to whatever are published at the time of publication and as its effects are revealed in new projects.
- There will never be a total consensus on design and the danger is to respond to popularism,
- Longer term – track objections to planning applications on design grounds.
- Difficult – I think in the end the consultation and input are more important. If meaningful then the code should demonstrably reflect some of the community's wishes.
- or watered-down requirements. After appropriate public consultation and design review processes, it should be a democratically elected LAs that shoulder that responsibility. by seeing just how many people bother to reply. Probably phrase question one to ask if there would be any faith in having a design code, and if this affects their willingness to become involved.
- Put a draft out for consultation. Provide a range of feedback channels to facilitate engagement.

6. WHAT ARE THE BARRIERS TO WIDER APPLICATION OF DESIGN CODES?

Key points: The fact that it is seen as time consuming, a bit abstract to some, and there is a perception that it requires a level of knowledge/skill; Having to deal with local constraints – design codes on greenfield site could be easier but most development has to be slotted in between other buildings or involve adopting existing structures which, almost inevitably, means that compromises have to be struck.

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- The preparation of Design Guides in parallel with the Local Plan, as suggested, would be as complex and time and resource demanding as that for current Local Plans; imposing a 30-month time limit, and making no commitment to funding additional resources is inconsistent with the ideals being promoted.
- Having to deal with local constraints; it would be relatively easy to adopt a design code for new build on a green field site, but life isn't always like that and projects have to be slotted in between other buildings or are about adapting existing structures and infrastructures which, almost inevitably, means that compromises have to be struck.
- - the perennial and persistent fear of local authorities, especially elected members on Development Control or Planning Committees, that they will lose out at appeal if they reject a major developer's offering, which always puts the case that their standard design houses are 'what people want'. Councils do not have as much money as developers nor a well enough based love or conviction about their local scene to stand up for what they, or local people, really want, or more to the point, DID want. It could be that the universal housebuilder style is now already too widespread to control.
- The fact that it is seen as time consuming, a bit abstract to some, and there is a perception that it requires a level of knowledge/skill
- Even with the best community engagement, some people will inevitably be, or feel, left out. The White Paper rather shifts from its early pages that effectively say that codes should be community-led, through its middle pages which suggest people should be involved to its later pages that say they might be consulted! Good, wide, creative communication with 'everybody' while a Code (or whatever) is being prepared is the key; leaving it to later stages and seeking responses never works. (Please, please do not go down the referendum route.)

7. WHO IS BEST PLACED TO DELIVER DESIGN CODES? LOCAL GOVERNMENT? PRIVATE SECTOR? COMMUNITIES?

You need resources (time, money, skills, and knowledge, including local knowledge) to do this well. I think local authorities are best placed to organise the logistics but they need to commission external facilitators to lead the work on community engagement – and local authorities have to be prepared to deliver on what then comes out of the process; Local authorities with community input. Local authorities and communities jointly.

- Most certainly communities. If their local design code were set by them, adopted as part of a District Plan, and carried weight in planning decisions, it would be a major stand against unsympathetic proposals and give confidence in going to appeal.
- Query usefulness of neighbourhood plans in this respect.
- *Best at parish council level, involving the commercial sector as well as voluntary sector.*
- *LA level would be too bland and not deal with diverse locations. Risk of loss of local distinctiveness.*
- It absolutely must be a collaborative process. Many Village/Town Design Statements failed to get adopted because the relevant communities had no professional help and, vice-versa, not a single Irish Statement made any difference to developments because they were done by architects to communities. And this sort of collaborative work needs skills in design and community development.

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8. WHAT WOULD YOU SAY ARE THE BARRIERS FOR YOUR OWN LOCAL AUTHORITIES IN IMPLEMENTING A DESIGN CODES?

Key points: Will require a huge shift in resources and skills to create design codes, where will these come from? (Not just design but community planning skills too). Requires effective communication channels between communities and local authority planning team. Also requires community champions willing to get involved. Could developers still water down standards at a later stage? If so, will effort be worth it? Fear of it being unpopular with developers and scaring them off, could be an issue in low viability areas?

- It would require a huge shift of resources away from development control functions towards master planning and placemaking – some of this may be a logical conclusion of the planning reforms proposed but without this shift, it is hard to see where the resources would come from
- Developers looking to compromise on what is laid down; local authorities not having the resources (and skills) to give adequate input to drawing up of design codes (a different skills set from those of a typical planning officer); lack of rigour in assessing applications against any design code adopted.
- Fear of it being unpopular with builders and scaring them off. That is builders of any kind, not just housing: we have long-standing scraps at planning level over the preference for use of real stone in many developments that would have been cheaper (and nastier) in brick. As for housing, the poor old traditional terrace has taken such an image-wrecking over the last forty years or so that it is going to be hard work to get anything like it accepted again, no matter how high a standard it would be built to, or how environmentally friendly it is. Fashion and perception rule overall.
- Resources in terms of time and staffing. Also requires effective communication channels between community's local authority planning team. And community champions willing to get involved.

9. DO YOU HAVE ANY EXPERIENCE OF BEING INVOLVED IN DESIGN CODES?

Key points: Few that have had experience, have had poor experiences – not adopted by Council so not embedded into design process or a requirement to follow; draft being watered down by housebuilder lobbying, unsure design guidance has made any difference.

- The trouble is that once an unsympathetic design brief, or one drawn up by an outside body only paying lip service to consultation, becomes part of the Planning process and embedded in the system, it becomes impossible to fight against it even in all sincerity.
- We must either have really well understood local design codes, done on a very careful and very widely researched basis, or, if we have to have a national one, It should be very simple, broad and flexible so that it gives a chance for meaningful debate when a guide is needed at local Development Control/ Planning Committee level.
- Above all, there is a need for certainty at local planning level that a small Council will not be bullied by fear of appeal by a big developer into having to accept something totally alien to their environment, which is what is happening nationwide right now. Wakefield Council recently adopted a Residential Design Guide and an Urban Design Framework. These were prepared by an outside organisation (IntegreatPlus of Sheffield) with some wider engagement and community consultation (not sure how much of the latter). Wakefield Civic Society was consulted, and we reviewed the draft documentation (but we did not contribute to its writing). I understand that some of the major housebuilders were not too happy with the requirements of the first draft of the

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Residential Design Guide and its contents were partially re-written (watered down?) in consequence before adoption. The Urban Design Framework is being applied although there have not been many major new projects recently. However, there is not much evidence of the Residential Design Guide having made much difference to date.

- St Albans: Unfortunately, they are not embedded into any design process or local authority requirements, which means there is no incentive to follow them or even acknowledge their existence. In the last few months we have seen a major development in the city centre, where the Council own the site, go through a disorganised design process which ended up with a poorly managed consultation process resulting in a design being chosen which has nothing distinctive about it and could be anywhere. No reference was made to the design code or the previous efforts to involve people in what they would like to see on the site. One conclusion from this is that it's important that any design code must have buy-in at local level from all political parties because there was a change in control of the council here and that may have been a factor here.

Additional comments

- There needs to be some flexibility – a design code that was agreed 10 years ago may seem old hat now (even if part implemented), may demand materials that can no longer be sourced, could be superseded by new technology etc. There needs to be an objective way in which the developer (but also 3rd parties) can suggest amendment and alterations other general thoughts on Design Codes would be welcome.
- The default of reliance on the National Design Guide would not be acceptable, because of the particular and varied character.
- Even if a 'rubber stamp' process, or extension of permitted development rights were implemented, a regime for monitoring and effective enforcement would be essential, with sufficient resources made available.
- Although there is lip-service to 'building beautiful', the only mechanism suggested for delivery is the adherence to Design Guides, or even 'Pattern Books'. The process of designing and constructing beauty in the built environment is overly complex, and definitions of beauty are wide, and time-variable; the absence of reference to architectural involvement is reprehensible. There are many examples of development which follow a 'pattern book' approach which do not look like Bath or Cheltenham, so the proposals are meaningless.
- Although much is made of the engagement of local communities, the reality is that public involvement would be restricted only to the preparation of the very simplified Local Plan, and any Design Guides or Codes. Since community interest is primarily aroused only when and if very local issues arise, public engagement, i.e. a democratic voice is likely to be considerably eroded, not enhanced.
- The references to 'PropTech' as rendering the planning system more accessible as well as accelerating the process of approval are unconvincing; the track record of adoption of electronic and digital solutions is appalling, and where successful has been characterised by years, and even decades of development.