

## **St Cuthbert (Out) Parish Council**

### **NALC and MHCLG in Response to Model Design Code Consultation EPC2-21.**

St Cuthbert Out is a rural parish which contains a number of villages. Each of our villages and rural settlements have their own separate and distinctive character. Whilst we support the introduction of design codes, we are concerned that both documents have a strong, almost exclusive, urban focus.

To respond specifically to the consultation document PC 2-21, we have no comment to make on the proposed changes to the NPPF wording in response to Questions 1 - 14. Our comments relate to Question 15 - Views on the National design Code.

#### **15(a). Content**

Villages and rural settlements are mentioned as headings in the matrix and tables but there are no examples or specific mentions in either document that provides helpful guidance. In the *Guidance Notes for Design Codes*, there are two mentions. In the Context Section (page 3), the “Area Type Matrix” lists Villages and Rural Settlements. The section on Public Spaces contains a sample table (page 51) which has the headings “rural”, “village”. In the *National Model Design Code*, there are a further two mentions. The Coding Plan, Fig 9 on page 12, lists rural and village. The only detailed information is on the following page (Fig 10). It states “Villages have their own distinctive character often with 2&3 storey buildings in an informal layout”. Under rural settlements it says “rural areas may include rural buildings and settlement types”.

In summary, in two documents with a total of 129 pages, the words village and rural appear on only four pages. On three of the four pages the words village and rural are used as headings on blank tables.

#### **15(b). Application & Use**

Under the heading “Objectives” in the *National Model Design Code* (p3, para 16), it states - “In the absence of local design guidance, local planning authorities will be expected to defer to the National Design Guide, National Model Design Guide and Manual for Streets.....”. As a rural parish we do not have the resources to produce individual design codes or neighbourhood plans to cover the many and diverse villages and rural settlements that lie within our boundary. Our fear is that developers will transfer their “design code approved” house designs and layouts from inappropriate urban and suburban areas, claiming that these somehow reflect the individual character and identity of our villages and rural settlements.

We support the coverage of topics in the *Guidance Notes*. Context, Movement, Nature, Built Form, Identity, Public Space, Use, Houses and Buildings, Resources, Lifespan and Community Engagement. The authors are to be congratulated on providing comprehensive design guidance for development in **urban** areas. The generic information may have use in guiding development in some rural areas but there is a complete lack of examples that assist design in a rural setting.

We cannot accept the documents in their present form and suggest three alternatives as a way forward.

1. The title of the documents is changed to “*Design Codes for Urban Areas*”.
2. Additional information is provided within the documents which provides design guidance for villages and rural settlements.
3. A qualifying statement is included (within the Introduction or Objectives) that makes it clear that the urban examples used in the *National Model Design Code & Guidance Notes for Design Codes* may not be suitable for transfer to villages and rural settlements without appropriate and significant modification.

In addition, we recommend the production of simple Village Design Statements for individual rural settlements. These should highlight the key elements that give each village its distinctive character, for example layout, building form, materials, landscape features. We support the suggestion by NALC that such design statements, when adopted, could be incorporated within or appended to local design codes.

### **15(c). Community Engagement**

We support the concept of engaging the relevant village communities in the preparation of local design codes and village design statements.

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