LIGHTWOOD

CREATE streets

Create Streets review of draft Wiltshire Design Guide

July 2023

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Executive summary

In its current form, the draft Wiltshire Design Guide is a good document which will probably improve some elements of technical place-making within Wiltshire. It is commendable.

- *It is well-structured* and follows the structure of the National Design Guide (NDG) and National Model Design Code (NMDC) thus making it easier to use and cross-refer to Government guidance.
- *It focuses on many of the right subjects.* Following the structure of the NDG, it refers to many design elements which are empirically associated with popular, prosperous and sustainable places.
- *It is a clear step in the right direction.* The guidance on designing sustainable, locally contextual buildings within mixed-use walkable neighbourhoods is very welcome, and more strongly worded than some other design guides.
- *Guide or code?* Overall, however, we would urge far more ambition and greater certainty to encourage more popular design and further de-risk development which meets clear criteria. It should set out far more unambiguously what the council is seeking and be less like a guide and more like a code.
- *Images not used to set or clarify guidance.* Although there are many illustrations, these are not used to elucidate the guidance being given, so the guidance remains largely verbal and ultimately arguable. This is contrary to the guidance given by the NMDC.
- *Language is not used to set clear guidance.* There's also much vague and imprecise language which means that the utility of the guidance in setting land price and establishing clear quality asks will be severely curtailed.
- *Not enough "hooks."* In consequence, although welcome and clearly well-intentioned, there just aren't enough "hooks" to really raise the design bar across Wiltshire.

In some ways the design guide feels a little "behind the curve" and is notably shy of de-risking development or setting clear quality asks as is encouraged by the National Planning Policy Framework (NPPF). At present, many local authorities are already deep in the production of more ambitious design codes with clear "musts" and "shoulds" which help those who want to do the right thing.

Over the following pages, we adumbrate in more detail our observations in order to help Wiltshire County Council further encourage developments which are popular, resilient, sustainable and beautiful.

Purpose of this review

This review has been commissioned by Lightwood and is a formal response to Wiltshire's upcoming Design Guide version 7 as published on 21 March 2023.

Our approach in conducting this review

This review is conducted by Create Streets. It makes use of our and others' research on (i) correlations between design with sustainability at level of building, place and location; (ii) correlations between design with resident wellbeing, (physical and mental health, physical activity, neighbourly connectedness and likely pro-social behaviour); and (iii) correlations with long term value.

Appendix one sets out high-level summaries of some relevant material from one of our book length studies, *Of Streets and Squares.*

This review also makes use of the Office for Place formal guidance on what makes for effective design codes (set out in Appendix Two) and our experience of drafting and using design guides and codes for local government arms-length bodies, planning authorities, highways authorities, parish councils, neighbourhood groups and land promoters. A full list of design guides and codes we have authored or critiqued is set out in Appendix Three.

Suggestions on and questions prompted by the draft

The Vision

1. *Does the guide live up to the foreword and vision?* Cllr Botterill's foreword is admirably clear: "Wiltshire is a beautiful county." And the vision sets a clear, if imprecise aim citing Core Policy 57 (CP57) from the local plan: "development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality". It is worth considering how firmly this guide obliges this and will actually prevent bad place-making? As points below will explore, we worry that the detail does not follow through on the laudable intent set out in the foreword.
2. *Why are you making a guide when the NPPF (and the future Levelling Up Act) are encouraging codes?* Page 6 cites the National Design Guide. However the image shows the National Model Design Code. This raises the question of the relevance of producing a design guide at this point in time. With the draft Levelling Up and Regeneration Bill, currently before Parliament, requiring design codes to be created by local authorities, if passed the design guide will be obsolete, possibly before it even gets adopted. With design codes giving far more scope to influence design, perhaps the design guide really should be a design code? On a positive note, the design guide could quite easily be the basis for a future code.
3. *What about transport?* Sustainability and Climate Resilience, one of the "Three Golden Threads", makes welcome reference to the need to become carbon neutral, the principles of 'reduce, reuse and recycle', efficient land use and innovative designs to account for flooding, overheating and pollution. What's missing is one of the most important solutions to sustainability – transport. This is especially important given that transport accounts for 45% of all emissions in the county[1]. The council should work with its Highways colleagues on ensuring transport plays a key role in its sustainability agenda.
4. *Where is your street design guide or code?* The quality of the public realm and street design play an enormous part in the overall quality of a development, and it's an area many schemes fall short in. Given that Wiltshire doesn't have a separate Street Design Guide or something similar, not including guidance for the design of streets and public spaces is a missed opportunity. The guide would ideally include approved types of parking, street sections, the design of walking and cycling paths, non-

1 https://www.wiltshire.gov.uk/article/5080/Understanding-Wiltshire-s-emissions

standard streets such as mews and materials which can enhance the public realm.

Local information on context

5. *Don't be prisoners of a poor context.* The Design Guide could provide greater detail about what should be considered as part of the context analysis. Often, the local context may be poorly designed post-war or new-build housing which neither the council or local residents would want repeated. Better examples may be in other parts of the settlement or further afield. Without this flexibility the guide risks embedding provably poor, low value and unprosperous places which would be perverse.

Identity

6. *Buildings' appearance matters.* Pricing and behavioural studies consistently show that what buildings look like really matters to the quality of place so it is surprising and unempirical that the guide is so reticent on this subject, especially given its close relation to Core Policy 57. Key elements of the character of a place, like materials, are only mentioned in passing and not in a way that is likely to prove effective. This is a serious lacuna.
7. *Be wary of images that contradict the text.* The choice of images on pages 24 and 25 (The Tannery in Holt and Somerbrook in Great Somerford) do not seem to align with the stated aims of this Policy, the buildings lacking a character which could be described as distinctive to Wiltshire. They appear very much like other contemporary schemes found throughout England.

How were photos of developments chosen? It's surprising that excellent new award-winning developments such as Wyndham Place, Tisbury (pictured) are not featured, given how closely it aligns with stated policy aims and even uses local Chilmark Stone.

8. *Why have you chosen the photos you have?* In this chapter and others, it could be helpful to have longer captions for photos to describe why they have been chosen.

9. *You need to set clearer visual standards for buildings.* This chapter would strongly benefit from more photo examples of the type and quality of architecture the council would expect developers to aspire towards. This would help remove uncertainty and ambiguity, leading to a more efficient planning process with fewer back and forth negotiations.

10. *What is appropriate and when?* In this chapter in particular, the Design Guide leaves too much open to interpretation. Given the low quality of many new developments, it may not be the best strategy to allow developers to decide if the context allows for something or not, or when and where something is "appropriate" or not. For example, point 3.3.1 notes that a development could enhance "the identity of the place" or "potentially becoming distinctive in its own right, if appropriate". It is not, specified, however, in which kinds of situations this would be the case, and it really ought to be in the domain of the design guide to do so. Otherwise, designers, developers and local communities are left guessing.

11. *What homes do you want?* 3.3.4 is a very welcome piece of guidance with its unambiguous discouragement of using standard house types. The point could go even further, however, and give stronger advice to housebuilders how best they could achieve that.

Built Form

12. *Some re-structuring required to align to government policy.* Built form, as addressed in both the National Design Guide and National Model Design Code, is the "the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces"[2]. It is not how the buildings look like, which should be found within the Identity chapter. The draft Design Guide seems to confuse the two. Sections 4.5.1-4.5.12 and 4.5.18-4.6.1 should be found in the Identity chapter, as they address building design, materials and detailing.

13. *Many more and more relevant images needed.* This chapter is probably the best example of the benefits more visuals would bring to the Design Guide, as many of the concepts described would be better illustrated by photos, diagrams or plans. For example, the approach of homes settling into their landscape (4.1.1 -4.1.3) would come across much more clearly with illustrations.

2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

14. *Don't be prisoners of current context. Things CAN improve.* Point 4.2.1 again raises the importance of how wide to cast the context analysis net. If the context is poorly designed low-density suburban housing, that may not necessarily be what the local community wants to see more of. The Former Westbury Hospital development featured in the Design Guide is an example of a project considerably denser than its immediate context, for example.

15. *Resolution required of internal contradictions within the Design Guide.* Aiming for compact housing layouts, as stated in 4.2.2, is contradicted both by 20m back-to-back distances and 10m minimum back garden lengths. If a more compact approach is desirable in urban areas, the Design Guide should consider making it clearer where a more compact approach is acceptable and how some standards might differ in these cases. This is an important example of the problem with Design Guides where high level principles can contradict in practice.

This sort of organic block pattern with a mix of plot and houses sizes seen in traditional parts of towns (such as this example in Salisbury) would be nearly impossible to achieve with strictly applied standards for back-to-back distances, minimum garden sizes and back garden access.

16. *Help create mews homes.* Would smaller dwellings within mews (4.2.7) be permitted to have smaller gardens? If so, the guidance should state so.

17. *More clarity on forms and heights please.* The guidance to use attached built forms "where possible" (4.4.5) and building heights (4.4.7) should specify how this will be gauged and whether different, stricter standards will apply in urban

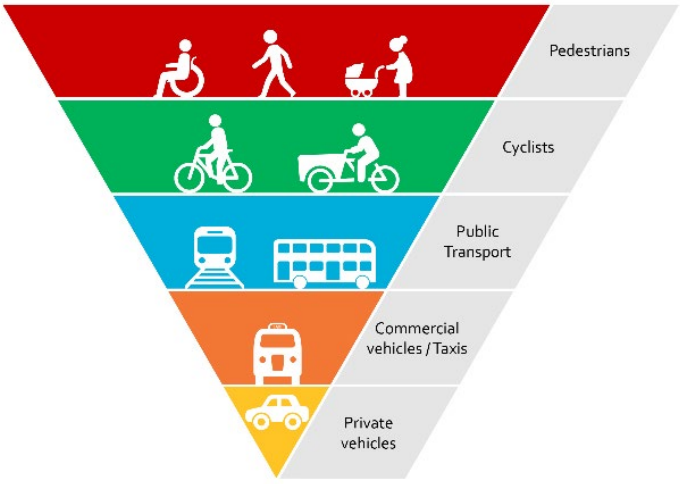
areas. In this regard and many others, the Design Guide has an opportunity to take out the guess work for designers and developers which at present is not being met.

18. *Restructuring required to align with national planning guidance.* Within the National Design Guide, points about street design such as 4.4.8 should be found in the Public Space chapter, not in Built Form.

19. *Beware of photos that contradict the text.* Are the images on pp. 36-37 meant to be examples of good civic buildings? If so, they do not seem to align with previously noted guidance for buildings to create a strong sense of place (CP57) and to enhance the local character (3.2). With few exceptions, they look like generic contemporary buildings which could be anywhere in the UK.

Movement

20. *Streets not Roads and no DB32 in towns*. It's very welcome to see the reference to Manual for Streets. The importance of designing streets around people rather than cars could be further stressed by including a diagram of mobility hierarchy such as this example:



Mobility hierarchy plan (Credit: Create Streets)

21. *More thought needed on the street pattern text to avoid contradictions between aims and consequences.* There's a contradiction in point 5.1.10, as creating a grid of streets is precisely the sort of street network which prevents the kind of traffic which leads to rat runs, as cars have multiple routes they can take instead of being funneled into a series of collector roads.

22. *Bus shelters to shelter under.* Although it may be covered in other Wiltshire documents, it could be noted that bus shelters should offer protection from the wind and rain.

23. *Good material on cycles but don't go too far.* Section 5.5 on page 47 about cycle parking is really well detailed with some good examples, our only caveat being that shower facilities for cyclists would be difficult to integrate in many small business locations.

24. *Yes to shared surfaces but will you follow through?* Many county highways authorities have a skeptical approach to shared surfaces. We welcome the positive guidance in section 5.6 but is it guidance which Wiltshire Highways is willing to accept? Please don't put this in planning policy if highways are not 100% on board. In our experience highways teams rarely are.

Nature

25. *What about light?* Given how much we are beginning to understand about the detrimental effect of blue lighting on both human and wildlife health, impacting circadian rhythms, sleep quality and safety, it's very surprising the Guide includes no information about the colour temperature of lighting or how the impact of lighting should be mitigated in new and existing streets.

26. *Green walls are a red herring.* We would suggest caution regarding green walls (point 6.2.7) as these have proven expensive and difficult to maintain[3]. Green roofs and street trees are usually more effective means to create green streets.

Public Space

27. *What about streets?* Although streets are noted in the introductory paragraph on page 61, the chapter itself largely focuses on public spaces and ignores streets. The guide should note that great places start with the design of streets, the most common type of public space. This should ideally be followed with more detailed guidance about street design.

28. *Asking people to have a think about something is not asking very much.* Point 7.1.7 is a good example of where language could be tightened to have greater impact. "Should be considered" is vague language which can easily be ignored.

3 https://www.architectsjournal.co.uk/news/is-the-boom-in-green-roofs-and-living-walls-good-for-sustainability

Uses

29. *What about co-working?* With the continued popularity of working from home arrangements, co-working spaces could be listed as potential community buildings in new developments.

30. *Flexible buildings and parking make for resilient places.* It is good to see encouragement of flexible uses of buildings, leaving open the option to convert commercial spaces into residential. A similar point should be made about parking: an area's parking requirements and typologies can change when use does. Parking should be designed in such a way that it can be replaced by housing, or a podium building in future.

Homes and Buildings

31. *Nuance on Secured by Design.* While it's positive to see acknowledgement that 'Secured by Design' standards may occasionally conflict with other design goals, it could perhaps be specified that these standards will more strictly apply in urban areas, thereby avoiding a 'one size fits all' approach. Design solutions to common Secured by Design issues such as block design, parking or lighting should be different in different types of neighbourhoods, otherwise new developments risk having the same kind of character.

32. *Major issues on garden size policy contradicting document's aims.* A concerning 'one size fits all' approach is also evident in minimum garden areas, with the requirement for minimum 10m deep gardens and 50sqm or larger gardens for "all houses". This may be appropriate for most suburban developments, but it will make denser traditional terraced or infill developments very difficult. In many situations this will force developers to opt for apartment buildings. It discourages the kinds of 'gentle density' developments most people actually want and will lead to two tiers of developments – either low density suburbs or high-density apartments with few choices in between.

    - Would smaller homes in mews also be required to have 10m gardens? This guidance could occasionally contradict earlier guidance stating that back-to-back distances can sometimes be less than 20m in denser developments. This contradiction is acknowledged without offering solutions.
    - This requirement also reflects a worrying trend of assuming that all people want the same things. While many people doubtlessly do prefer a larger garden, many others do not want the burden of maintenance and may be satisfied, even

prefer, smaller gardens with just enough room for a patio (especially if the smaller garden coincided with a reduction in the cost of the property).

33. *Careful on Part O Building Regs.* There may be a potential conflict with point 9.1.11 and new building regulations which require a guard height of 1100mm. This is too high to provide a view out from sitting height unless (unopenable) windows are included below this height. This will have implications on the types of windows included in designs, such as traditional windows with a sill. It may be worth including guidance about expected daylight provided by windows to avoid developers including small windows with a sill height at 1100mm. The Secretary of State has announced a review into this policy so this policy area remains "in flux."

34. *Call a garden a garden and a spade a spade.* Although it is a common term, 'defensible space' (9.3.2) is a decidedly negative term to describe space which is actually positive in nature: a small garden of one's own. We prefer the more neutral "public/ private buffer" or just say what it is, a front garden.

35. *Don't ban terraced homes by mistake.* Point 9.3.9 about allowing residents to access gardens without going through their home seems, at first glance, to be a sensible one, but often difficult to design in practice. Examples of how to accomplish this would be welcome, for example via rear footpaths or passageways between buildings (in the case of a terrace). This point also potentially contradicts earlier guidance encouraging attached built forms.

Resources

36. *The risk of contradiction between aims and policy.* In its aim for "compact, walkable neighhourhoods", Wiltshire's planning officials will have to be nuanced about the application of some of the aforementioned guidance. There are many potential conflicts between this aim and guidance on back-to-back distances, minimum garden sizes and, potentially, the application of Secured by Design parking standards.

37. *Solutions to overheating are still in their infancy in the UK*. It's great to see their inclusion, but it would be helpful to show more photo examples of the kinds of solutions which would be accepted (whether shutters, awnings, louvres or similar).

Lifespan & Legacy

38. *Encourage a track record of post-occupancy surveys.* The encouragement of post-occupancy surveys is good and could go further by stating that evidence of having completed them on previous developments will form part of the consideration of future planning applications.

Endnote

Don't forget that master-planning is still important. It is worth emphasising that no Design Guide operates in a vacuum independent from strategic planning and the master-planning of individual sites. All are interlinked. The achievement of good design and better places does of course require choosing the right sites in the right places.

Section 2.0 of the Design Guide notes that all applications will have a planning as well as physical context. Whilst site selection is the role of the Local Plan, where clearly applicable (for example in respect of key settlements), site-selection processes should flow from a strategic exercise in urban design at the settlement scale.

The location of schools, wider movement strategies, green corridors and other high level design elements are crucial to the design of streets and blocks. They influence how people move about, how walkable a place is and how it interacts with existing neighborhoods.

Where long term growth areas present themselves for change, initial phases and land use mixes should come forward on the basis of a strong overall long-term vision and concept plan. To isolate the design of a first phase from the consideration of a bigger picture increases the risk that optimal outcomes will not be realised. For example, a school could be delivered in a place that ticks a short term box, but to the detriment of longer term placemaking. Multi-phase and cross plan period growth areas command a strategic and coordinated approach.

Appendix one: some proven best practice on what makes for popular places

Gentle density is your friend
Open spaces should be 50-100 metres wide
The best and most beautiful streets and squares are typically in areas of 'gentle density', half way between the extremes of tower blocks and extended suburbia. Buildings that are 3-7 storeys high, built up space that is 45-65% of the total area, and blocks between 50-150 metres long are normally best.
Greenery - little and often
• Plant trees 8-15m apart
• 5-15% of land should be public gardens
People like being in green places. Urban greenery is associated with higher physical & mental wellbeing, as long as it is used. You can maximise this by planting street trees, interweaving green spaces into streets and squares. However, greenery on its own is not enough. Squares can be popular places without a blade of grass in sight.
Structured benches and statues
6-10% of squares should be seating
Where seating is matters. Siting your benches in a 'structured' way helps humans play the right roles: benches that face a fountain; an arcade that lines a square, with a statue or podium in it. But beware of 'bench wash', using seating to try to fix an ugly or windy chasm. Most people will avoid them.
Beauty really matters
Protected buldings improve perception of place by 19%
The most popular places with 70-90% of people have a strong sense of place, buildings worth protecting and 'could not be anywhere'. They have 'active facades' that 'live' and have variety in pattern. These developments also tend to be more long-lasting and resilient. Their organised complexity attracts, interests and reassures.
Mix it up!
60% of people prefer to live in a mixed use neighbourhood
Places with a textured mix of different land uses, and active façades, are nearly always more successful. They attract more people and generate more diverse and engaging environments. They can work for longer portions of the day by mixing people at work, lunch, home and play.
Edges attract and protect
80% of people prefer to sit facing a court
The edges of streets and squares attract us. This is partly because we are used to pavements going there, even when a street is pedestrianised. But it also because there is more to look at (shop fronts, cafés) and (in a square) edges allow us to step back and either watch the world go past, or sample the space.
Human scale enclosure
Height to width ratio from 1:0.85 to 1:1.5
Most people like to spend time in places that are enclosed and human scale, without feeling too shut in. There is a necessary moment for views that open up as you round a corner, for grand vistas, for open parks, but many of the most popular streets surrounding and linking such views are surprisingly human-scale.
Walkability works
20
Residential roads should be 20mph
..but does not quite mean maximising space to walk. Compact, walkable & 'bikeable' environments are good for you. People walk in them more and are healthier and happier. This in turn drives higher values. More walking is encouraged by engaging façades, regularly spaced trees, presence of resting places, and wide pavements.

Appendix two: Office for Place guidance on good design codes

This "list of 10 criteria that represent good practice in creating, applying and enforcing design codes" was published by the Office for Place in February 2023: 10 criteria for effective design coding - GOV.UK (www.gov.uk)

"These 10 criteria for effective design coding have been developed by members of the advisory board for the Office for Place. They are designed to provide a framework of good practice in the preparation, application and enforcement of design codes, based on the board's experience of preparing and working with design codes.

This list does not constitute government planning policy or guidance, it is designed as a helpful tool for local authorities, neighbourhood planning groups and all those involved in creating effective, local design codes. For detailed government guidance on design codes, please refer to the National Model Design Code.

1. Set a clear vision.

A clear and concise vision, setting out ambitions for the area, must be prepared at the start of the design coding process. This will act as a guide, be relevant to the area and record straightforward aspirations so that future action can be evaluated.

2. Align with policies and be evidence based.

Codes will take into account relevant national and local planning policies and have a basis in evidence of the types of places that support well-being and deliver healthy and sustainable outcomes for communities, and places that are safe and inclusive.

3. Find out what people really like.

The codes must be based on robust evidence that has been obtained on what is popular about the design and character of the existing area, and the potential future for the area, and this must be apparent in the way the codes are worded and illustrated.

4. Keep them short, visual and numerical wherever possible.

The codes must be clear and brief, concentrate on essential points, should be illustrated with analytical diagrams, such as sections, not just 'reference images', and must be written and presented in a way that can be understood by both professionals and non-professionals.

5. Keep them practical.

The codes must apply to practical choices that are achievable in the design and construction of new places, streets and buildings without unduly restricting the opportunities for creativity.

6. Set definitive requirements through the use of language.

Codes must set requirements to which a design can unambiguously conform or not conform (this will be based on words like, 'must', 'will' and 'required'). Guidance can also be usefully included but this must be made clearly distinct from the codes (guidance will use words like, 'should', 'could', 'would', 'generally' etc.)

7. Keep them real.

Codes must provide sufficient information to direct design to what is demonstrably popular (see 3, above) in such a way that the results will be recognised by the local community, while allowing opportunities for creative input.

8. Keep them relevant.

What is coded must be relevant to the area that is being coded, taking into account the context and scale of development. For example, it might be appropriate to code for: the density required, the context of new development, relationship to what is existing, what must be conserved; the urban, suburban, rural or new character of the area covered.

9. Make sure they are enforced.

Local authorities must use or establish a process for the approval of codes prepared by others and all codes must be enforced at appropriate points in the process.

10. Allow them to change over time.

Design codes should reflect changes in social, technical and environmental circumstances and so should be reviewed from time to time, taking into account feedback from the outcomes of the code."

Appendix three: some of Create Streets' recent design code and design guide experience

Code	*Client*	*Focus*
Healthy Streets for Surrey: Surrey Street Design Guide	Surrey County Council	A recently adopted web-based design guide that allows a range of users, from curious residents to master-planners to highways engineers quickly and easily to access and understand design guidance to help them create healthy streets which are safe, green, beautiful and resilient. Part funded by Office for Place Pathfinder exemplar programme.
Wychavon Design Code	Wychavon District Council	An exemplar area-based design code based on the structure of the NMDC divided into multiple geographic areas to reflect the varying character across the District.
Chesham Infill Design Code	Chesham Town Council	Pioneering Neighbourhood Development Orders and supporting Infill Design Code for sites throughout Chesham. Featured in *London Planning Magazine* and *Sunday Times.*
Shop front design guide	Historic England & Isle of White Council	Heritage design guide and process flow for historic high street renovation and design. Funded by Heritage High Street programme.
Wadhurst Design Code	Wadhurst Parish Council	Design code as part of a neighbourhood plan for a rural parish council.

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