

# Appendix 1

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### Belfast City Council's Response to draft Crumlin Road Masterplan

#### Introduction

- 1.1 Belfast City Council welcomes this ambitious proposal. For a long time the Crumlin road gaol has been a derelict site located in a contentious community area. In general the plan brings a significant opportunity for balancing development and regeneration across the city; given the ongoing development in the East of the City at Titanic Quarter and the Sirrocco Quays concept Masterplan.
- 1.2 Our general comment would be at the lack of detail of the drawings in the documents. Overall the drawings do not seem to offer enough detail to comment on, especially the ones illustrating the whole site. Layout of some proposed spaces and buildings have been detailed in the main document, some areas omitted.
- 1.3 The Council is currently targeting regeneration efforts along Belfast's arterial routes. The Crumlin Road is one of the priority routes identified as requiring targeted regeneration and therefore we are very supportive of the development of the Gaol site.
- 1.4 A significant proportion of the draft Masterplan has been based around UK best practice case studies, which the Council strongly supports. We would also recommend to DSD to look at the development of Oxford Castle project that received Royal Institute of Chartered Surveyors Project of the Year Award 2007.
- 1.5 In terms of more specific comments we have shaped our response around the sustainable communities concept. The Sustainable Communities agenda has become pertinent to Belfast as we are all working towards the common goal of creating "Places where people want to live and work now and in the future".

This means:

- Balancing and integrating social, economic and environmental components of their community;
- Meeting the needs of existing and future generations;
- Recognising the cross cutting nature of issues affecting communities;
- Working in a coordinated way with a wide range of interests and organisations;
- Respecting the needs of other communities in the wider region or internationally; and
- Recognising that sustainable communities are diverse and reflect their local circumstances. There is no standard template to fit them all.

- 1.6 In the last six months the Council has been devising the Community Support Plan for Belfast for which it had to gather evidence on needs in Belfast. The Council focused on Belfast's four parliamentary constituencies. This response is based around the 'eight categories' and needs that the Council has found exist in North Belfast.

## **2. Leadership & Governance**

2.1 North Belfast needs support to strengthen its community capacity and infrastructure, which this regeneration plan for Crumlin road will significantly help. However, the Council believes that this project could do a lot more to increase community capacity in the area by, for example, encouraging social enterprise and cultural tourism.

2.2 A particular concern is that the focus of the regeneration is not concentrated on the frontage of the Crumlin Road, as we feel it is here where all communities can benefit most and a successful proposal developed. The masterplan moves the focus of the site away from the Crumlin Road to the rear of the gaol site which:

- Compromises the Crumlin Road frontage as the arterial route/main street
- Undermines the strength of the Courthouse & Crumlin Gaol as focal point.

2.3 Currently the plan suggests to place the 'heartspace' to the rear of the Gaol and to the internal area of development which:

- Reinforces the internalisation of communities. We believe that focusing on the centre on the Crumlin Road would help create a focus to draw communities out.
- Could potentially have risks as anti-social behaviour and interface issues could be problematic without the surveillance of passing traffic and footfall especially at night.

2.4 Thus the Council would suggest that the Masterplan provides a greater balance between outwards and inwards orientation.

## **3. Transport & Connectivity**

3.1 It is crucial to improve the connectivity of North Belfast with other neighbourhoods in the city. The Masterplan does place a lot of emphasis on transport, but the Council's concern is too much emphasis on car parks and car uses. In order to support the concept of 'safe space' & 'shared space' consideration needs to be given to good public transport links in addition to car access.

3.2 The creation of a major junction could seem an unnecessary use of land as the existing junction with minor re-design could accommodate site traffic. The new junction would further erode the road frontage. The development of buildings is preferable with the retention of the existing street frontage in order to strengthen the urban form.

## **4. Services**

4.1 Improving access to services and more open spaces are very important in North Belfast. The Masterplan does seem to incorporate the needs of different age groups.

4.2 The Council has recently commissioned Deloitte to undertake research on 'Accessing services in a divided City' under its Conflict Transformation Project. In

relation to developing 'safe space' & 'shared space' it would be useful for the Masterplan to take into account findings from this research which will be available early next year.

## **5. Environmental**

5.1 A lot more needs to be done to improve the health and well being of the people in North Belfast. While the creation of a health centre on the site is very positive, the Council would suggest a detailed Health Impact Assessment to be undertaken.

5.2 A comprehensive Health Impact Assessment of the Lower Shankill was commissioned by the NIHE. The assessment recognises the importance of the Masterplanning process for Crumlin Road Gaol site and recommends that there should be liaison to identify and exploit synergies between various strategies in the area. Although the draft Masterplan does acknowledge the need to consider the impact on the wider regeneration of North Belfast, Lower Oldpark and Lower Shankill, the Council recommends that a detailed HIA of any proposals for the development of the Masterplan area should be carried out, and aligned with others.

5.3 In the era of global warming and climate change, the Council believes that any future regeneration project needs to incorporate renewable energy solutions depending on feasibility. This site could be a great candidate for photovoltaics, solar water heating systems and the use of biomass boilers for heating. We think that considering the ambitious Government targets

- to achieve 12% of electricity to come from renewable energy by 2012 and
- reduce carbon emission by 50% below 1990's level by 2050

DSD needs to consider further these options.

5.4 The Council would strongly advise any developer, planner or architect working on the implementation of the Masterplan proposals to:

- Discuss the need for appropriate waste and recycling storage with the Council; and
- Follows the advice contained in the Council's publication "Waste and Recycling Storage Requirements, a guide for developers, architects and building contractors".

## **6. Social inclusion**

6.1 It is vital to address interface issues in North Belfast and reduce the number of people living in deprivation.

6.2 Integration of local communities is paramount in this process particularly given the fractious nature of North Belfast. While the proposals mention the 'Shared Future' at the beginning the draft Masterplan does not really demonstrate how it will integrate the principles of a Shared Future in order to ensure that public space is created that can be accessed by all the community.

6.3 The Council supports the proposals to undertake further consultations about the plans but this should not be a one time deal. On-going consultation will be critical

to the development of this site and can help to ensure local community integration into the process.

6.4 This regeneration project needs to take a broader community significance and focus firstly on the needs of local communities and then on the need of Belfast.

6.5 Community safety needs to be considered as anti-social behaviour especially at night may become an issue that can undermine wider promotion and use of the site.

## **7. Economy**

7.1 It is essential that local people are linked to the opportunities that will avail from the site's development eg. job opportunities. Having in mind the nature of long term unemployment within the area, Local Employment Initiatives should be provided to connect local people to the jobs on site. This can also link in with the learning and skills proposals that DSD has for the site.

7.2 It is very positive that the development will encourage social economy enterprises, but the Council would strongly encourage support of LOCAL social economy enterprises which will not only help economic inclusion on the area but also increased community capacity.

7.3 The document includes very limited elaboration on proposals for economic development activity on this site. The Council feels that, given the difficulties of this site, economic development activity would provide an appropriate "buffer zone" and a neutral use. As Belfast in general lacks quality business facilities, we would suggest a stronger emphasis on developing some on the site, both industry hubs (such as creative or knowledge industries) and incubation to link education facilities and employment opportunities.

7.4 We welcome the proposal for creative workplaces and note that this will fill the gap created by proposals for Brookfield Mill which might not proceed.

## **8. Infrastructure & Physical**

8.1 We welcome proposals to support sustainability in site development and note that Belfast City Council is developing best practice in such methods through its North Foreshore site and also through its BERI network (Brownfields Europe Regeneration Initiative).

### *Character*

8.2 This project poses quite a challenge having in mind design in a sensitive historic environment and difficult community situation. Connection to the local community needs to be achieved through culture connections to the past, as well as connections and use.

### *Functions*

8.3 Functions of different spaces and venues need to be rigorously accessed, both day time and night time use, formal and informal and different user groups. It needs to be considered:

- night time space/ public road/interface concerns – there may be risk of creating a 'dead' and unsafe place

- how is the public realm integrated into different uses
- lack of activity in the central area with no purposeful function could compromise public realm

### *Leisure*

- 8.4 The Masterplan correctly points out that the Council has agreed that the Crumlin Road Gaol and Girdwood Barracks is its preferred location for a Leisure Centre in the North of the City.
- 8.5 The Masterplan outlines the need to ensure that in relation to the proposed leisure and recreational facilities that where possible the emphasis needs to be on developing multi use facilities that will meet the requirements of the Council, St Malachy's College, other local schools and the wider community need and we would fully endorse this thinking.
- 8.6 The Masterplan proposals for the Leisure Centre include concept facilities to be included in the Leisure Centre and surrounding outdoor sports pitches. We would stress that our normal practice in developing new leisure facilities within Council is that we would commission an independent consultation exercise with the local community to identify and get support for the type of facilities they wish to see included in any proposed facilities. At this stage this exercise has not been undertaken and it is only when this has been completed that we will be in a position to specify our exact requirements for the proposed facility.
- 8.7 In addition to this, more recently when developing new leisure facilities the Council has been keen to explore opportunities for partnership working across the public, private and voluntary sectors. The recent Grove Health & Wellbeing facility developed in partnership with Social Services and the Education Board is a prime example of the type of opportunity that the Council wants to explore fully. In developing the Leisure Centre on the Crumlin Road & Girdwood site in addition to the opportunities for partnership working with both the Mater Hospital and St Malachy's School we would also require the flexibility to further explore other potential partnership arrangements before agreeing our final plans for the site.
- 8.8 In relation to the proposals for children's play areas and open space within the site while we welcome the fact that these have been included in the Masterplan, as stated above in relation to providing leisure facilities it will also be important to engage in a wider consultation exercise with the local community before finalising any proposals for play areas and open space within the site.

### *Design*

- 8.9 We would strongly suggest the Crumlin road frontage should be at the forefront of this development – it should provide a sense of continuity for the whole road. Linkages should concentrate on the Gaol's Crumlin Road frontage and Courthouse as a package. Whole project should be phased from this point backwards into adjacent communities.
- 8.10 We understood that the future of the Court House was to be included in the proposals. Historically it was very much associated with the Gaol, including an underground tunnel between the two, and it is difficult to understand why there is no reference to it in the draft plan. It appears on the map of the area in the document which gives the impression that it is part of the Masterplan area.

8.11 The suggestion ARC road is a strong structuring element but it seems that its purpose is dominated by vehicular use within the site, will this be well integrated into the community and will it be used as a street or will it look more like an entrance to a business park? Access by other routes should be feasible- ARC not the only option.

#### *Housing development*

8.12 We recognise that housing development will be very important issue on the site. We feel that any proposals need to be flexible and more work needs to be done with communities in line with the “Shared Future” agenda.

#### *Public Realm*

8.13 The area of public realm at the ‘heartspace’ is large and it seems that no frontage is created along the ARC route. The public realm is weakened by a lack of frontage, where public space lies on both sides on the main pedestrian route and the suggested tree closure/landscaping looks insufficient to produce enclosure.

8.14 The quality of the public realm and landscape is unclear from the document. The mass and scale of the public realm may in reality be hard to fill monotonous areas of deserted space.

8.15 The relationship between spaces and the buildings seems unclear. Little consideration is given to the character of the spaces – we are unconvinced that the proposed public realm is robust enough to support the development of this scale and we have a query over what the main public benefit will be.

### **9. Social and Cultural**

9.1 As this development encompasses combining historic with modern, local community and wider strategic uses, it is essential to build its special Identity combining character and heritage. It would also be beneficial to develop overall branding of the place in order to attract wider city and out of Belfast audience.

9.2 The Crumlin Road Gaol site provides an excellent opportunity for the development of tourism initiatives on the site. We would recommend the tourism benefits could be further enhanced through the provision of a visitor attraction on the site which could be an excellent catalyst for generating new tourism business with associated infrastructure services, e.g. retail and cafe facilities.

9.2 The place could be a cultural capital of North Belfast with a range of events, festivals and, as suggested by the Masterplan, cultural quarters, museum and gallery. Also, the emphasis should be placed on cultural tourism, in which the Council already holds a significant experience. Local pride in the area needs to be nurtured from the outset.