



Report to:	Development Committee
Subject:	Belfast City Council response to Draft Living Places - An Urban Stewardship and Design Guide for Northern Ireland
Date:	22 October 2013
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1	Relevant Background Information
1.1	The Department of the Environment (DOE) published Draft Living Places - An Urban Stewardship and Design Guide for Northern Ireland in August 2013 for public consultation. The Department has requested comments on the guide before the closing date on the 31 st October.
1.2	The Urban Stewardship and Design Guide identifies ten key principles behind good place making: <ul style="list-style-type: none"> - Visionary - Collaborative - Contextual - Responsible - Accessible - Hospitable - Vibrant & Diverse - Crafted - Viable - Enduring
1.3	The document seeks to inform and inspire all those involved in the process of managing (stewardship) and making (design) urban places, with a view to raising standards across Northern Ireland. The focus of the guide is urban areas, including cities, towns, villages and neighbourhoods.
1.4	The document will be a Material Consideration in the determination of planning applications and planning appeals for development affecting all urban places.

2	Key Issues
2.1	A proposed draft response is attached in Appendix 1 for consideration by committee as a suggested submission to the Department and a summary of the issues is outlined below:

2.2	While the Urban Stewardship and Design Guide for Northern Ireland is welcomed, the Council would argue that there is limited guidance within the document. The concepts generally seem sound and are a good starting point however, the key issue is how the guide will be implemented as the purpose and standing of the document is unclear.
2.3	The DOE is currently preparing a single Strategic Planning Policy Statement (SPPS) in order to consolidate the existing suite of Planning Policy Statements. Clarification is required in terms of the relationship between the Living Places Guide and the proposed SPPS.
2.4	The document appears to overlook a number of the key issues which contribute to good urban spaces in many cities including parks (such as Botanic Gardens) and the availability of green urban space, sustainable transport (e.g. cycle lanes), climate change adaptation in buildings (green roofs/walls etc) and adaptation to flooding, and food markets or allotments/urban space used for growing food. It also fails to identify what makes people want to go to meet up in these spaces.
2.5	If the guide is being promoted for use by “everyone”, it may be helpful to provide a little more context about what the document may mean in practice, clarify roles and responsibilities in terms of who will be responsible for applying the principles and who will ‘enforce’ them. From a Council perspective, it is unclear what the document will mean for the Council in practice.
2.6	It is difficult to ascertain what this will mean in practice and how the qualities will be assessed and weighted.
2.7	There appears to be a greater emphasis on planning and design principles in the guidance with little mention of the stewardship, maintenance, management, or consideration of lifecycle costs to maintain the quality of the public realm after the works have been completed. The stewardship of public spaces is always the most difficult component to deliver, to ensure continuity in the management and maintenance of the quality of the public realm, and there is little in the way of guidance on how this can be achieved. In particular, the burden for stewardship has tended to fall on Council’s, and post Review of Public Administration (RPA), with the transfer of assets and maintenance liabilities from the Department for Social Development (DSD), this burden is likely to increase.
2.8	It is suggested the Council request clarification on how the document relates to the Local Area Development Plans that Councils will be required to prepare following the RPA.

3	Resource Implications
3.1	No revenue cost associated with the request

4	Equality and Good Relations Considerations
4.1	There are no specific Equality and Good Relations Considerations attached to this report.

5	Recommendations
5.1	Members are requested to consider the content of the proposed draft response to the Urban Stewardship and Design Guide, as set out in Appendix 1, and if appropriate endorse this as the formal response to the Department of the Environment.

6	Decision Tracking
Submission of an agreed response following consideration and agreement of the Committee.	

7	Key to Abbreviations
DRD - Department for Regional Development SPPS - Strategic Planning Policy Statement	

8	Documents Attached
Appendix 1: Belfast City Council response to Draft Living Places - An Urban Stewardship and Design Guide for Northern Ireland	

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1. Overview

- 1.1 Belfast City Council welcomes the opportunity to comment on the Draft Living Places – An Urban Stewardship and Design Guide for Northern Ireland. The Council is fully supportive of the need for an Urban Stewardship and Design Guide for Northern Ireland given the impact place plays on our lives. The Guide aims to establish the key principles behind good place making. A key priority for Belfast City Council outlined in our Corporate Plan under City Leadership is to ‘Invest in our city and maximise our place shaping role.
- 1.2 The Draft Living Places - An Urban Stewardship and Design Guide for Northern Ireland, published by the Department for the Environment (DOE), seeks to inform and inspire all those involved in the process of managing (stewardship) and making (design) urban places, with a view to raising standards across Northern Ireland.
- 1.3 The document uses case studies of urban areas throughout Northern Ireland to exemplify 10 qualities which contribute to successful cities, towns and villages. These qualities are considered critical ingredients to successful places and include:
- Visionary;
 - Collaborative;
 - Contextual;
 - Responsible;
 - Accessible;
 - Hospitable;
 - Vibrant and diverse;
 - Crafted;
 - Viable; and
 - Enduring.
- 1.4 Planning applications that include masterplans in urban areas will be required to demonstrate how the qualities above have informed the development proposals. The document also suggests that the document will be a material consideration for development affecting all urban places.

2. Background

- 2.1 Belfast City Council first published its city wide Masterplan in 2004 and recently published a review of the Masterplan for public consultation. The Masterplan Review identifies a revised set of spatial and strategic objectives:
- **The Learning City** - Harnessing the economic power of the City’s Higher and Further Education Institutions. Addressing low levels of educational attainment within deprived communities.
 - **The Accessible and Connected City** - Enhancing accessibility and connectivity internationally, regionally and locally.
 - **The Low Carbon City** - Clean technology, renewable energy and efficiency will drive further growth in the economy and reduce costs for businesses and households.

- **The Digital City** - City wide ultrafast broadband and integrated smart city infrastructure driving innovation and supporting growth and efficient delivery of public services.
- **The Belfast City Region** - Working together across administrative and geographical boundaries to deliver the city's growth potential.
- **The Centre City** - An accessible vibrant and dynamic centre city driving the regional economy.
- **The Neighbourhood City** - Neighbourhoods which engender confident, caring, cohesive and resilient communities.

3. General Comments

- 3.1 While the Urban Stewardship and Design Guide for Northern Ireland is welcomed, the Council would argue that there is limited guidance within the document. The document appears to focus on presenting and getting buy-in of the qualities. While the concepts generally seem sound and are a good starting point, the key issue is how the Guide will be implemented as the purpose and standing of the document is unclear. The Council would also request clarification if Living Places will become statutory guidance.
- 3.2 The Council is aware of the ongoing preparation of a single Strategic Planning Policy Statement (SPPS) in order to consolidate the existing suite of Planning Policy Statements. Clarification is required in terms of the relationship between the Living Places Guide and the proposed SPPS.
- 3.3 The document appears to overlook a number of the key issues which contribute to good urban spaces in many cities including parks (such as Botanic Gardens) and the availability of green urban space, sustainable transport (e.g. cycle lanes), climate change adaptation in buildings (green roofs/walls etc) and adaptation to flooding, and food markets or allotments/urban space used for growing food. It also fails to identify what makes people want to go to meet up in these spaces.
- 3.4 If the guide is being promoted for use by "everyone", it may be helpful to provide a little more context about what the document may mean in practice as well as clarifying roles and responsibilities in terms of who will be responsible for applying the principles and who will 'enforce' them. From a Council perspective, it is unclear what the document will mean for the Council in practice. The Council would also question how the document will be implemented in practice in the absence of appropriate policy/legislation.
- 3.5 The document states that it will be a material consideration in assessing planning applications and planning appeals for developments affecting urban places. And when submitting masterplans in an urban area, applicants will be required to demonstrate how the ten qualities outlined out in the document have shaped and informed their proposals. It is difficult to ascertain what this will mean in practice and how the qualities will be assessed and weighted. It is also unclear if the document will apply only to strategic masterplans or if it will also apply to other smaller scale developments that may impact on urban spaces such as the University of Ulster redevelopment. Greater clarity needs to be provided as potential applicants or their representatives, particularly in a planning appeals situation, may

be tempted to argue over the definition of an “urban area”, particularly in a rural settlement context.

- 3.6 It should be noted that urban and rural settlements are very different in their scale, character and function. They will have their unique challenges which will shape the public realm. While the ten guiding principles can be broadly applied to different settlement types, the document appears to be primarily concerned with shaping the “public realm and public spaces within urban areas”. It is noted that most of the case studies are about successful public realm and public space shaping in both urban and rural settlements. It is suggested that the guidance may be more appropriately renamed to “Living Places – Public Realm Stewardship and Design Guidelines for Northern Ireland” which would be inclusive of both urban and rural settlements.
- 3.7 The guidance is trying to combine urban planning / design and urban stewardship to promote good quality sustainable urban environments in order to create a legacy for future generations. Within the document there appears to be an assumed reliance on design rather than planning to create quality urban spaces. The Council would argue that there needs to be a sequential application of both planning and design.
- 3.8 That said, there appears to be a greater emphasis on planning and design principles in the guidance with little mention of stewardship, maintenance, management, or consideration of lifecycle costs to maintain the quality of the public realm after the works have been completed. The stewardship of public spaces is always the most difficult component to deliver, to ensure continuity in the management and maintenance of the quality of the public realm, and there is little in terms of guidance on how this can be achieved. In particular, the burden for stewardship has tended to fall on Councils, and post Review of Public Administration (RPA), with the transfer of assets and maintenance liabilities from the Department for Social Development (DSD), this burden is likely to increase. It will be important to ensure that life cycle cost and ease of maintenance are an important consideration during the design phase, as well as ensuring sufficient funding is available to ensure that quality can be maintained.
- 3.9 The document recognises that planning and regeneration functions are to be transferred to Local Councils, and the guidance which establishes broad principles will still be relevant in a period of transition. The Council would request clarification on how the document relates to the Local Area Development Plans that Councils will be required to prepare following the RPA. The Development Plan and any physical and urban design work should complement and have regard for the Community Plan. The Community Plan will help provide leadership, active participation and collaboration and also the ‘understanding of place’ cited in the guide. The two processes should be seen as mutually reinforcing and mutually beneficial.
- 3.10 The document recognises that the reorganisation of government structures provides the opportunity to break down the administrative barriers that currently exist to collaborative working in the built environment. Civic leadership by Councils could provide greater commitment to collaboration and participation that would secure robust planning and place shaping of the public realm. The changes in planning policy will move towards a spatially oriented planning approach with Community Planning and area based regeneration initiatives. After RPA Councils will have

responsibility for planning and cleansing functions, enabling them to be best placed to take a holistic approach to manage the design process and stewardship of public realm to ensure quality can be maintained.

4.0 Specific Comments

4.1 The Urban North

The Council considers a key element of the historical analysis ought to be recognition that Northern Ireland has been a place of non-nucleated settlement, and there continues to be a cultural preference for this model, which means that urban settlements function rather differently than in most of the rest of Europe. The balance between urban function in terms of residence and service provision is different, and this is particularly the case in Belfast where the population size in no way reflects its cultural and economic dominance.

4.2 Challenges

The draft document identifies a number of challenges that have hindered successful place making. The Council would broadly agree that the challenges identified have impinged on the ability to create high quality urban places. The Council considers that the implementation of the ten qualities could contribute to addressing these challenges.

4.3 The document acknowledges the impact of the Troubles and ongoing segregation on our society. The Council would argue that the divided nature of Northern Ireland is not adequately followed through into the other qualities. Shared space is mentioned under the “responsible” quality in terms of car use, however in Good Relations terminology it has a completely different meaning. Furthermore, given the impact of division on Northern Ireland, perhaps shared space, particularly along interfaces, should be mentioned under “Visionary” and as a consideration under “understanding place”.

4.4 Good Places

Many of the examples throughout the document relate to public funded and driven development. It is recommended that the guide should illustrate more private sector examples. In addition, the Council considers that Belfast is heavily under-represented in the case studies, many of which are minor schemes. The Streets Ahead scheme (design-led) has been selected but the benefits realisation methodology is by no means clear and there is no visible cost-benefit analysis.

4.5 The Council has been involved in the development of quality places, both within the city and across the province which demonstrate a range of the qualities, for example, Grove Wellbeing Centre, Falls Park Masterplan, development of a “Walkability” Index, development of public spaces at Woodvale and Dunville parks, and the Renewing the Routes programme.

4.6 Since 1983 the Council in partnership with Roads Service and DSD have been responsible for planting 11,500 street trees which have made a significant impact on our city and within the provincial towns. The Council is responsible for the

management and maintenance of all the street trees in Greater Belfast, Castlereagh, Lisburn, Newtownards, Bangor, Ballymena/Larne, and Newtownabbey/Carrickfergus.

4.7 In addition, the Council is also involved in developing environmental improvement schemes throughout the city on behalf of DSD, in partnership with the Department for Regional Development (DRD) Roads Service, such as Ballymacarrett Walkway, Falls Road/Glen Road open site, and Bridge End. Furthermore, the Council also undertake annual playground refurbishments throughout the city which has involved installing 'inclusive' playground equipment.

4.8 **Bad Places**

The Council considers that "bad places" are largely a result of planning for a specific outcome which fail to consider all other factors, for example, road junctions designed to improve the flow of traffic to support economy which result in the segregation of communities from many local amenities (for example Cromac Street, Ormeau Avenue, Westlink). Good planning will require a considered and balanced approach reflecting all potential impacts.

4.9 It is noted that the area around Dunbar Link is used to illustrate bad places. The Council would agree that this area is not a particularly attractive urban environment due to the wide road network, large expanses of surface level car-parking and the presence of numerous dilapidated and vacant properties in the surrounding area. The Council would suggest that an alternative photograph is used which depicts these negative aspects of the Dunbar Link as the image used appears to focus on to the Council's operational Cleansing Depot.

4.10 **Qualities**

A number of the qualities identified within the draft Living Places document reflect the Strategic and Spatial objectives identified in the Belfast City Masterplan Review, particularly the Council's priorities in terms of:

- An accessible and connected city;
- The low carbon city; and
- The neighbourhood city.

4.11 The ten guiding principles provide a useful checklist to help designers, and developers in the preparation of their planning proposals. While it is difficult to argue or disagree with the ten qualities there are a number of points to note.

4.12 The Council would request greater clarification on how the ten qualities were developed and selected. Are they based on good practice and research from other cities or countries? The document mentions a collaborative process and the appendices reference other material and policy documents. The Council would suggest that the document requires a better explanation of where the qualities came from and how much weight is attached to them in other areas or jurisdictions.

4.13 **Visionary**

The Council considers that Local Authorities would be best placed to provide the civic leadership to develop strategic masterplans. Post RPA the Council will have responsibility for Community Planning which will enable community involvement in

the preparation of plans for their neighbourhoods. A key priority for the Council outlined in the Corporate Plan as part of City Leadership is to 'maximise the place shaping role. The consultation document refers to the need for skills but does not elaborate on how such skills and capacity will be developed and supported. The Council would suggest that the document provides further guidance on the type of support provided and the source envisaged. Within the Belfast City Masterplan Review it is suggested that a Framework for the city centre should be prepared by the Department of Social Development and the council to cohesively address the potential for continued regeneration. The Review notes that an essential element of the framework would be to harness the opportunity to enhance the environment through quality design and proposes a newly created senior position within the Council, with proven skills in urban design and placemaking would help drive this agenda.

- 4.14 The lack of "City Architects" or similar champions reflects the multi-disciplinary, multi-organisation, multi-funding nature of development in our cities and urban areas. City Architects are still evident in European Cities and their effectiveness is linked to their cities' functions / control over land ownership, the ability to incentivise development and the amount of risk and cost in development that the Local and Municipal authorities will bear.
- 4.15 There is an argument for a "champion" around specific developments and it is notable that there is no mention of Titanic Quarter within this document under any category despite the significant lobbying and collaboration from both public and private sector in the initial phases of this ongoing development in the city.
- 4.16 **Collaborative**
Councils are well placed to provide the civic leadership to promote active participation, and encourage collaborative working with stakeholders. This is evidenced in the current development work being undertaken by the Council to deliver the City Investment Programme.
- 4.17 It could be considered that there is support in the guide for increased use of Vesting Powers to achieve delivery of developments to meet the guidelines without recognition of the time it can take to achieve the site assembly required and the necessary support from the DOE. Some assurance is needed for developers around recognition from planners that schemes put forward may be less than perfect but the benefits far outweigh the defects.
- 4.18 There is a significant overlap with the collaborative approach and community planning, although community planning is not specifically mentioned within the document. The importance of place and the links to community planning should be better articulated. Perhaps under the "Visionary", "Collaborative" and "Contextual" qualities there should be reference to the Community Plan.
- 4.19 **Contextual**
This provides the usual contextual design principles that should be adopted by designers preparing plans and designs for public spaces. These could be

incorporated into Design Briefs and Development Briefs to ensure that Project Teams and Developers have a good understanding of the context which has to be considered as part of the design process.

4.20 Responsible

The Council is supportive of the inclusion of this quality. A low carbon city is a strategic objective within the Belfast City Masterplan Review. The Council considers that clean technology, renewable energy and efficiency will drive further growth in the economy and reduce future costs for businesses and households.

4.21 The Masterplan Review highlights the need for the city centre to develop sequentially from the inside out. Encouraging the re-use of brownfield land in city centre locations for a variety of uses will be integral to reviving urban areas and achieving more sustainable patterns of development. It is suggested that the document should mention the reuse of vacant sites within existing settlements as a counter to the pressures for less sustainable development or sprawl into surrounding rural areas.

4.22 It is noted that environmental considerations are referenced in certain parts of the document (for example car ownership and pollution); the Council is disappointed that there is no specific section on the environment within the document, for example, under the "Sustainable" quality. The Council suggests that reference could be made to aspects such as environmental quality, sustainable building materials, environmental/heritage protection, stewardship and local quality of life within such a section.

4.23 Within the document, it is mentioned that climate change is a major challenge and this is reflected in this section by encouraging sustainable urban drainage and conservation of resources. However, there is a lack of awareness of the European Union drive to shift Europe toward a "Low Carbon Future" (Europe 2020 Strategy), and this is a priority funding theme post 2014. This will have a key influence on the future shape of our public realm, with a greater emphasis on "Green Infrastructure Plans" to reduce our dependence on cars and promote public transport, walking and cycling. This would also include enhancing biodiversity within cities and increasing tree planting to mitigate the impact of climate change. This section should also include the issue of choice of materials and life cycle cost to ensure resource efficiency, to minimise waste, and to promote sustainable reuse of materials.

4.24 The document should also include planning and design for the management of waste. The Council would refer to the "Local Government Waste Storage Guide for Northern Ireland" and request that it is taken into account within Living Places. The guide can be downloaded from:
<http://www.belfastcity.gov.uk/buildingcontrol-environment/buildingcontrol/wasteguidelines.aspx>

4.25 The Waste Storage Guide was developed by local government, with close consultation and collaboration with central government. It seeks to provide practical advice and guidance to architects, developers and building contractors, to ensure that waste is properly planned for at the earliest stage of the design and build

process of development and that the arrangements for storing and accessing waste are properly considered when designing buildings and building developments. It is suggested that a link to the Waste Storage Guide could be provided within the Living Places Guide or could be added to this list of references.

4.26 Accessible

The Living Places document states that accessibility is critical in developing successful public spaces. In particular, connectivity is essential to ensure the integration of new public realm spaces into the urban fabric. The Council also recognises the importance of accessibility as it has been identified as a strategic objective in the Belfast City Masterplan Review. Within the Masterplan Review, accessibility is considered critical to the economic competitiveness of the city.

4.27 Hospitable

It is noted that “healthy” and “safety” have been identified as sub sections under the heading “hospitable”. Providing a healthy living environment for the city’s residents in order to deliver thriving neighbourhoods is a priority within the Belfast City Masterplan Review therefore the Council would argue that both principles should be qualities in their own right. The Council is also represented on the Belfast Strategic Partnership for Health and Wellbeing and endorses the Framework for Action to address life inequalities 2011 – 2015. Regenerating living places and healthy spaces is identified as a priority with the Framework for Action and the Council has incorporated positive health outcomes into a number of initiatives such as Active Travel and Belfast Public Bike Hire Scheme.

4.28 Vibrant & Diverse

This is critical to ensure that our public realm areas are attractive. This will be challenging in the current economic climate where there suppressed demand for commercial development, constraints on private investment and public funding. The consequence is that the amount of vacant spaces is likely to increase. In particular, the changes in the retail sector are having a profound impact on cities and town centres, with predictions of further contractions in retail space due to the growth in online shopping. There is a need for innovative ideas to encourage diversity in land uses that will maintain the vibrancies of public spaces.

4.29 Crafted

This provides useful principles that should be adopted by designers preparing plans and designs for attractive public spaces. It may be useful to suggest maintenance specifications to ensure quality stewardship of the public spaces.

4.30 Viable

In the current economic climate this will be challenging with the lack of available investment funding particularly from private sector developers. The guidance proposes “testing of new uses” by trial periods for new activities however the Council would require clarification as to whether this is to be delivered in the context of a relaxation on the need for planning permission for a certain period and

the mechanisms for longer term management / control. The assessment of economic viability and sustainability of a scheme is entering a realm which is not in the usual planning remit and is very subjective given that each applicant will be different in the resources that they can bring to secure satisfactory completion of a development and arrangements around future management. The applicant may not even be the actual developer of the project.

4.31 **Enduring**

This provides the useful principles that should be adopted for the creation of attractive public spaces.

4.32 **Bringing it all together**

While the document provides some useful guidance for the planning and development of the public realms in our cities, towns and villages, it will be important to be pragmatic and realistic in the implementation of the guidance, particularly in this challenging economic climate where there limited investment, and a greater need to prioritise the use of financial and organisational resources.

4.33 **Appendices**

It is noted that PPS 5 has not been included within the relevant policy documents identified in section B 2). It is considered that PPS 5 should be included.