



BELFAST CIVIC TRUST

25/6/2018

Dear Sirs,

**Subject: Presentation to planning Committee**

The Belfast Civic Trust has been involved in efforts to enhance the City over the years. In particular we comment on Planning applications and lobby to preserve the City's historic and heritage buildings. These buildings act as a catalyst for tourism economic growth and by contributing to the distinctiveness of the City encourage investment in the City. We run heritage tours of the city and currently have a touring exhibition on the Story of Belfast. We would be keen to make a presentation ( which includes a short PowerPoint presentation) to the Council Planning Committee on our vision for the City and planning issues as we see them. We would be grateful if you could accede to this request.

Yours Sincerely

Belfast Civic Trust

*Support your Civic and Environmental Charity*

**Belfast Civic Trust Limited T| 028 9268 2483**

Registered Office c/o Duffy & Co. (A&T) Limited, 126 Eglantine Avenue, Belfast, BT9 6EU



### *What is Belfast Civic Trust?*

Belfast Civic Trust was formed by a group of people concerned about the city and its surroundings. We are a voluntary, non-profit organisation registered as a charity.

Anyone is welcome to join. Our membership encompasses all walks of life, from layperson to the professional. We enjoy the support of the Ulster Architectural Heritage Society and the Belfast Buildings Preservation Trust. Our Committee includes Architects, Planners and Academics as well as concerned Belfast Citizens.

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### *What does Belfast Civic Trust do?*

- \* We liaise with local and central government, architects, planners, voluntary and community groups and other bodies on environmental issues.
- \* We believe that Belfast's Victorian and Edwardian architectural core should be preserved and enhanced by sympathetic development for cultural, environmental and economic reasons to foster a better environment to live in, a brighter city and to encourage tourism.

We have supported various schemes such as the Victoria Square Development and the St Annes Square development and Crumlin Road Courthouse development. We also monitor planning applications and make comments in relation to same.

- \* We have regular meetings with planners, environmental and cultural groups focussing on many different urban issues. We organise talks on Architectural and planning matters relating to the City. Topics have included 'Tourism and the Environment' and revitalisation of Cathedral Quarter and Laganside.
- \* We have undertaken research projects, such as studies of Ligoniel, Ballyhackamore and the Northside/St. Anne's Cathedral area. Many of our conclusions and recommendations have been accepted by the Department of the Environment as a blueprint for renewing the identity of these unique sectors of Belfast.
- \* We initiate and promote amenity schemes in association with local communities.

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- \* We have run schools' competitions including the Northern Ireland Schools' debating competition as part of a campaign to increase awareness of the environment.
- \* We have produced the Belfast Civic Trust Festival Walk Trail booklets in collaboration with Belfast City Council,. This series outlines walks of special interest around our city. We recently produced the Belfast Christian Heritage and Belfast Architectural Tourist Trail .
  - We campaign and lobby for new buildings in Belfast to be sympathetic to the character of the city and to be of a high design standard to make Belfast a better place for all to live in.
  - We run bus and walking tours of the City's architecture and history.
  - We have produced an exhibition on the "Story of Belfast" and have campaigned for a Museum or visitor attraction on this theme.

## **City Centre Regeneration proposals -- some ideas**

Conservation Area denigration -- no more demolitions allowed therein  
Appropriate replacement buildings in conservation area  
Tall Buildings Policy -- Should be enacted asap so that tall buildings not allowed in city centre to preserve city character for tourism  
Crumlin Road Courthouse -- must be refurbished. Scheme would be a catalyst for regeneration of North Belfast and provide employment  
Reuse of City Centre heritage buildings to be given priority (eg Ewart Building and Assembly rooms, Donegall Street)  
Support Berry Street reopening  
Support Reinvigoration of Bank Square  
Support infill adjacent to motorway bridge on Donegall street near Carlisle circus.  
Proper enforcement of City Centre conservation area  
Derelict Buildings VSB to remove greenery and Art students to put in place mock windows  
Restrict tall buildings in the City centre to preserve character of the city  
Pavement café culture to be encouraged  
Library Quarter to be pedestrianised  
Social housing to be built by Housing Associations in some empty spaces near to City centre.  
Rates reduction or removal for Arts uses  
Dunbar link to be narrowed and tree lined  
Additional tree planting on access routes and were possible on City centre streets  
City Centre Shop front competition to be reintroduced  
City centre shops and offices to be encouraged to keep clean area in front of shop  
Priority to be given to redevelopment of Great Victoria street empty sites  
Market trading in the form of a open air market to be licenced for Bank Square and Writers Square as soon as possible to attract City centre footfall

## **ARGUMENT AGAINST HIGH RISE BUILDINGS IN THE CITY CENTRE**

### **1. Conservation Area**

A large portion of the city is within a conservation area (City Centre Conservation Area etc). High rise buildings in the city centre are likely to be so adjacent to a conservation area that they will have a significant impact on nearby conservation areas. The high rise is unlikely to be sympathetic to the Victorian Edwardian nature of city centre conservation areas. Tall structures will often have an impact far beyond their immediate vicinity and would not be sensitive to adjacent conservation areas and would thus breach the Planning Policy on Conservation Areas.

#### **Environmental Objectives**

The Department's objectives in exercising its planning functions within the Conservation area are:

- to prevent insensitive development and redevelopment;
- to enhance the intrinsic character of the Area, and to set off its features of merit;
- to protect and enhance views into and from the Conservation Area;
- to protect the general amenity of the Conservation Area by discouraging inappropriate development;
- new buildings will be expected to take account of the character of their neighbours. They should, in mass and outline, be sympathetic to the rhythm of the street scene.

Development near to, and visually related to the Conservation Area will be required to be sited and designed in scale, form and materials so as to be in harmony with the buildings and general appearance of the Conservation Area.

### **2. Planning Policies**

A high rise development in the city centre will often breach the following planning policies:

- PPS 6 - Development affecting the setting of a listed building.
- PPS 5 - Retailing and Town Centres.

#### **Planning Policy PPS 6**

#### **Policy BH 11**

### **Development affecting the Setting of a Listed Building**

The Department will not normally permit development, which would adversely affect the setting of a listed building. Development proposals will normally only be considered appropriate where all the following criteria are met:

- (a) the detailed design respects the listed building in terms of scale, height, massing and alignment;
- (b) the works proposed make use of traditional or sympathetic building materials and techniques which respect those found on the building; and
- (c) the nature of the use proposed respects the character of the setting of the building.

The setting of a listed building is often an essential part of the building's character.

Any proposals for development, which by its character or location may have an adverse affect on the setting of listed buildings, will require very careful consideration by the Department.

The design of new buildings planned to stand alongside historic buildings is particularly critical. Such buildings must be designed to respect their setting, alignment and use appropriate materials.

### **Planning Policy PPS 5**

The Department wishes to emphasise the importance of urban design within town centres and will require development proposals in town centres to make a positive contribution to townscape and be sensitive to the character of the area surrounding the site in terms of design, scale and use of materials of both the buildings and the space around the buildings. New development within town centres should minimise visual, functional and physical disruption. Insensitive development, which disrupts the scale and rhythm of townscape, will be resisted. Building design will need to be architecturally sympathetic to locations, such as Conservation Areas or the settings of listed buildings. The Department may prepare development briefs for development opportunity sites, which would set out the appropriate design guidance.

### **Physical Environment of Town Centres**

The quality of the environment in town centres is of great importance.

- conserving and enhancing historic buildings and townscape.

### **3 Effect on Development and BMAP**

Tall buildings increase density of development but can also lead to a concentration of development in a small space resulting in delay or lack of development of vacant sites nearby. Belfast City centre still has many vacant sites which are underdeveloped in the City centre and adjacent thereto. The large number of tall building proposals will delay development of these sites.( eg the large car park site adjacent to the land registry on Great

Victoria Street) High density development can be made on sites without necessarily involving the construction of tall buildings. Such developments are usually more sensitive to the surrounding area.

It should also be noted that after gaining planning permission if the market goes against developers the scale of these developments can result in sites lying vacant for a considerable length of time.

It should also be noted that BMAP is quite prescriptive on the heights of Buildings in the City centre. If we have a comprehensive plan for the City why do we not follow it?

4. **Effect of Development on Belfast Hills**

Belfast is a city in an attractive setting with the Lough and surrounding hills, High rise development affects views of the hills from the city and also has a detrimental visual effect on views of the city from the surrounding hills. At a time when efforts are being made to protect environmentally the Belfast Hills, the context of the city within the valley surrounded by hills should not be destroyed by inappropriate high rise development.

5. **Sensitivity to Vernacular of City Centre**

It is easier for a low rise building (e.g. up to 8 storeys) to respect the vernacular of the city centre and the Conservation Areas therein.

High rise buildings have an impact far beyond their immediate vicinity and are seldom in tune with the Victorian/Edwardian theme of the city centre core.

This heritage should not be dwarfed or downgraded by massive scale modernist development more appropriate to an American city. Sympathetic design does respect the Victorian/Edwardian heritage whilst many modern large scale high rise buildings do not.

6. **Effect on perspective of City Centre Streets**

Many city centre streets have buildings at similar heights on both sides and provide a good visual perspective. The parallel streets on either side of the City Hall provide a perfect frame for spectacular views to the Belfast hills. In particular the perspective down Chichester Street to the Waterfront Hall would be destroyed by inappropriate high rise development on or adjacent to Chichester Street, Royal Avenue, Arthur Street and the Linenhall conservation area all provide examples of streets with perspectives which would be destroyed by high rise development.

7. **Effect of High Rise on General Character of the City**

Why should Belfast be a high rise city? There is no proof that building up is more economical than low rise higher density building Low rise is arguably more environmentally sustainable. Do we wish to create so called iconic buildings at the expense of our wonderful built heritage? This would be a fundamental change to the overall cityscape. Irish cities and towns have generally avoided the high rise building culture. This has enabled these towns and cities to maintain their distinctive Irish feel, which is uniquely valuable from a tourist and cultural perspective. If the need for new