

**Stewart Street, Belfast**

**Planning Application LA04/2016/0559/F**

**Design Review Report**

**Stewart Street, Belfast – Planning Application  
LA04/2016/0559/F**

**DESIGN REVIEW**

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**MAG Design Review Panel:**

Panel Chair	Richard Partington, MAG Expert Advisor
Member 1	John FitzGerald, MAG Expert Advisor
Member 2	Terence McCaw, MAG Expert Advisor
Member 3	Alex Wright, MAG Expert Advisor

**Attendees representing the Developer:**

Alan Mains

Stephen Blaney                      Architect - Coogan and Co Architects

**Attendees from the Markets Development Association:**

Kathleen McCarthy

Áine Brady

Margaret Downey

Fintan Hargey

**Contributors via Conference Call:**

Kelly Mills                              Belfast City Council - Planning

Emma Hanratty                         Belfast City Council - Planning

**Observers:**

Eileen McCallion                      MAG Secretariat, Department for Communities

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### 1.00 Terms of Reference

- 1.01 In 2006, the Northern Ireland government adopted the Policy for Architecture and the Built Environment, and in 2007 established a publicly selected group of professionals – the Ministerial Advisory Group (MAG) – to advise on the implementation and development of the policy. MAG promotes the highest quality of places for all those involved in using and shaping them.
- 1.02 A central part of our work is providing direct advice on new development schemes by means of undertaking a design briefing or review. This is a method which can play an important role in creating better developments and improving people's quality of life.
- 1.03 The design review offers independent, impartial advice on the design of new buildings, landscapes and public spaces. The Planning or Design team are not bound to act on any of the recommendations made by the MAG Design Review Panel.
- 1.04 The Design Review Panel's main terms of reference are those of the Architecture and Built Environment Policy for Northern Ireland. Planning policies are not generally referenced.
- 1.05 The report on the review, which is classed as 'Restricted', will be issued to Aidan Thatcher, Director of Planning and Building Control for Belfast City Council, for distribution. The Department for Communities will consider whether disclosure should take place in response to any Freedom of Information requests, and will consult with MAG before finalising its decision on disclosure. If the Planning Team choose to bring the report into the public domain, it must be published in its entirety.

### 2.00 Introduction

- 2.01 This review, requested by Belfast City Council, considered the scheme drawings and documents recommended for approval under planning consent LA04/2016/0559/F and subsequently subject to a Judicial Review.
- 2.02 The panel initially met in private. The review did not follow the usual participatory pre-application procedure whereby an applicant's presentation is followed by questions and discussion and then verbal

feedback and a review report. The applicant's design team were not present during the first stage of the review.

### **3.00 The Review Process**

- 3.01 Panel members had made themselves familiar with the planning application material for a substantial B1 office proposal (2167 sq m GIA), in advance of the meeting. In particular we reviewed the evolution of the design through the planning process; the quality of information and supporting technical studies; the proposed materials and details; and the broader urban design and public realm considerations.
- 3.02 A site visit was undertaken and the development site was viewed from several vantage points including the neighbouring residential area known as the Markets and from the established office and employment area to the north known as Lanyon Place. The panel's site visit came to the attention of members of the local community who then contacted MAG. As a consequence MAG secretariat facilitated a brief representation to the Panel by members of the Markets community and, in the interests of fairness and impartiality, also with the developer and its architect.
- 3.03 These representations were made on the same day with the purpose of helping the Panel to understand the evolution of the proposals and the extent of engagement, particularly with regard to a community led project to the north as the site known as 'the tunnels' (Z/2012/1421/F). It was also helpful to hear, first hand, the applicant's plans for delivering the project and the evolution of their design.
- 3.04 The panel discussion was also preceded by a conference call with planning officers, who clarified the interpretation of planning policy, particularly the designation of the site and the weight that both adopted (BUAP) and un-adopted (BMAP) and evolving policy might carry. The officers also updated the panel on the status of the application, which is in essence a 'live' application.

### 4.00 The Site and its Context

- 4.01 The project is located on the northern and eastern edges of a roughly rectangular piece of land to the east of the junction between Stewart Street and East Bridge Street. On the southern edge of the site Stewart Street forms a gently curving boundary whose southern edge is formed by the backs of short housing terraces of the Markets area. The site constraints are complicated and these constraints are not easily appreciated from the submission material, particularly the relationships of the various levels of roads and pathways. On the northern side of the site East Bridge Street is elevated at a steady incline as it approaches Albert Bridge and rises over railway lines that run in a north-south direction across the Lagan. At the west end the level difference is approximately 2.4m and at the east it is approximately 4.9m. Under the bridge arched tunnels connect the site to Lanyon Place, though these are currently fenced and inaccessible. The tunnels project, a community-led plan to introduce a crèche, gym and small business unit in the unused archways, achieved planning approval in 2015.
- 4.02 On the eastern edge the site is flanked by the blank wall of Lanyon Place Station (formerly Belfast Central Station). The station entrance is at the street level of East Bridge Street.
- 4.03 Stewart Street also rises from the south-east to the north-west and where it meets East Street is approximately 2.0m above the site level. The site itself is flat, covered in compacted material and devoid of any natural features or trees. Two easements impose material constraints. To the east, there is an existing sewer has and easement along the boundary with the railway line. A 5m access strip is provided along the south side of the tunnels under East Bridge Street to allow for inspections and repair of the tunnel structures and their facing arches.
- 4.04 To the south of Stewart Street the Markets housing is predominantly two and three storey traditional construction typical of the schemes built by the Northern Ireland Housing Executive in the 1970s and 80s. The streets within this area, particularly Friendly Street and Friendly Place are dominated by car-parking and Stewart Street is also intensively used for parking, presumably an overspill from the office workers at Lanyon Place.

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### 5.00 The Proposal

- 5.01 The scheme proposes two tall buildings, one on the East Bridge Street frontage and one at right angles to it running along the eastern railway boundary. At their highest these buildings are 12 and 14 storeys respectively, but each steps down in height at the southern and western ends. The East Bridge Street block is set some 10m from the footpath and access is gained at this level (+7.07m AOD) by a short bridging footpath. The building does not therefore make a conventional frontage to the street.
- 5.02 Entrances to both the main buildings are on the north-east corner of the site from an elevated and circular platform/podium with a single tree growing through an opening at its centre. From the podium access to the lower tunnels level is gained by a circular stair and a public lift. The ground level is some 4.9m below this access level.
- 5.03 The two main buildings are of unequal depth. The eastern building (block B) is approximately 15m deep, a conventional office plan depth. The East Bridge Street block (block A) measures 30m deep at its widest, a very deep plan, that would preclude natural ventilation and deny outward views from the centre of the space. The floor plates are drawn as conventional open plan space with the usual cores and vertical servicing (lift, escape stairs, services risers etc).
- 5.04 The southern, Stewart Street, edge is formed by two low building of three storeys following the curve of the pavement. These are broken centrally by a wide public staircase that initiates a route through the site via a podium-level, landscaped space. This leads indirectly towards the main building entrances on the north-east corner. Between the low blocks (C and D) and blocks A and B the landscaped area has a tapering shape and is approximately 20 m in width at its widest. It is described on the drawings as a public garden but no detailed information is provided for the design or management of this space.
- 5.05 The buildings are uniformly clad in a combination of curtain-walled glazing and aluminium panels with projecting horizontal shading structures ('brise soleil' to reduce solar gain) on all sides including the northern façade. The low blocks, C and D have brick framed bases with glazing above in a curiously top-heavy configuration. For the main facades no information is provided on the detailed connections, material supports, material texture, opening or spandrel areas, or the general quality of the façade assembly. The three-dimensional views

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included do not portray the scheme in sufficient detail to establish the design quality of the façade construction.

- 5.06 On the lower level a public area is proposed between the buildings and the tunnels. This space is 10 m wide and is unlikely to support the landscaping and tree planting indicated on the drawings. It is permanently in the shade as the applicant's own shadow analysis clearly demonstrates. This space is described as a "street" in the design and access statement, but by virtue of its sunken position does not connect with any other pavements or public spaces, except by a lift and a long flight of stairs at its western end, and by a passageway through the vaults at its eastern end. Facing on to this space at the base of the 12 storey office there are four retail units, each approximately 100 sq m in area, but no information is given on their servicing or viability, which would seem highly questionable given the lack of footfall or visibility from the public domain.

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### **6.00 The Panel's Observations: Preamble**

- 6.01 The project has been presented to the panel as a 'finalised' design, albeit one that is not necessarily adequately drawn or described (see comments below under further information) to fully understand its relationship to the surroundings or the detail of its execution.
- 6.02 The panel's observations are therefore presented in two sections. The first describes the opportunities and alternative approaches that may have been taken had the applicant or planning service requested an earlier design review. The second section critiques the scheme as presented, assuming that the mix of uses has been settled and that the scale of development proposed is broadly acceptable in planning terms (if not the disposition and arrangement of the building mass).
- 6.03 A final section reviews the quality of the drawings, their faithfulness to the actual proposal and the information that we consider to be absent but necessary for a proper understanding of the project.

### **7.00 The Panel's Observations: Section 1 – Strategic Opportunities**

- 7.01 The supporting design and access statement identifies the opportunities for re-establishing historical connections to the city centre at street level and under the tunnels to the north. It notes the historical evolution and settlement of the area, its employment, culture and people. The statement also advocates the reinstatement of historic development and street patterns and the integration of community led initiatives, particularly the 'tunnels' community project. To us, however, the influence of this analysis and commentary is insufficiently manifest in the design proposal, which is essentially a self-contained office development, inward looking and giving little to the public frontages other than the activity and occupation of the space during office hours.
- 7.02 We recognize that the 'tunnels' proposal has been incorporated by widening the prescribed access strip along East Bridge Street to 10 metres, but by arranging a substantial building mass between the tunnels and the Markets community the design compromises the purpose of the community project and prevents direct access to the tunnels entrances. The computer generated renderings of this space suggest a well-lit and vibrant paved terrace in front of the tunnels but in reality it will always be overshadowed, with relatively poor access.

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- 7.03 Similarly the south to north route through the site over the parking area, with substantial level changes, will discourage connectivity and public enjoyment of the limited landscape space. For this space to be truly 'public' and accessible from the Markets it should be at the Stewart Street level rather than elevated on a podium structure. The panel had concerns that although the stated intention of the applicant is to allow full public access to all open areas within the site at all times, this may in time be altered by a future owner. If this was the case there could be severe limitations placed on the pedestrian connectivity through the site at certain times of day.
- 7.04 The token bridge and 'plaza' space at the north-east entrance is similarly misconceived, and too mean in proportion to accommodate any activity other than an elevated crossing from street to building entrance. The space below this at the level of the tunnels project is likely to become a dark and forbidding 'undercroft'.
- 7.05 If one of the guiding aims of the project is to improve connectivity and purposefully include the tunnels within the project the proposal must be re-organized in a way that will allow direct and visible access to the tunnels themselves and allow them to open onto a properly functioning public space. We recommend that the arrangement of buildings on the site is reconsidered.
- 7.06 Two possibilities for improving public accessibility to the tunnels occur to us. The first would be to concentrate the building mass along the eastern side of the site with the creation of a new public space to the west. If this space was nearer to the level of Stewart Street it would be visible from the Markets and the resulting space would provide a public transition from the residential community to the office district in this part of the city. The second possibility would be to arrange buildings to the eastern and western edges of the site enclosing a space in the centre. The northern edge would form a third side of this south facing space and the route through to Lanyon Place, proposed to be in one of the east most tunnels, would be accessible.
- 7.07 Either of these options would require the reduction of parking or the introduction of parking at a basement level to ensure that the public space is accessible.
- 7.08 As to the height of the building, we recognize that the scheme has had regard to the height of neighbouring buildings and the precedent set by previously approved schemes. However, building height alone is not

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an adequate measure of a building's impact on either the skyline or its immediate neighbourhood. The depth of the building, its size in plan and the articulation of form and material will influence its mass and presence.

- 7.09 We also challenge the view that the office building should be comparable in height to Lanyon Place because of the affinity of use. In reality Lanyon Place is separated from the site by the elevated East Bridge Street and by the service road that is Lanyon Place itself. These two edges could easily be viewed as significant boundaries that contain the office district and define its area. We believe that the site should be viewed as an important transition between the two established areas of business and living. As such, it could make a better contribution to the overall regeneration of the area if it was treated as a mixed-use opportunity rather than a mono-cultural extension of the office / employment district.
- 7.10 The buildings are substantial in height and plan form, and will become a bulky and very prominent presence when viewed from the south. Although the stepping of the main building forms to the south and the east attempts to mitigate this bulk, we do not think that the architectural treatments are sufficiently accomplished to overcome this concern.

### **8.00 The Panel's Observations: Section 2 – Detailed Comments**

- 8.01 The elevation and section drawings give very little detailed information regarding the construction (how the façade is made) and services (how air and heat or cooling is distributed). An office building of this size will have a substantial heating and cooling load, which in turn requires large areas of air-handling and heating and cooling equipment. Some plant space is indicated at basement level but this an impractical location for cooling or air handling. There is no indication of any plant enclosure on the roof and there will surely need to be a substantial area and a significant height of plant enclosure. We advise that any future planning conditions specifically ask for details of plant space and a roof plan with suitably written additional conditions to ensure that the height of the building as consented is not exceeded to accommodate services areas.

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- 8.02 The elevation drawings do not show the detail of the materials proposed: the fixings of the cladding system, brise-soleil, external projections; the joints between cladding panels, the types of glazing, the mullion caps, cills and flashings. Any condition regarding materials should require further detail to be submitted including detailed construction or design intent drawings. For a building of such prominence, and a major application, it would also be reasonable to require full-height sample areas of construction rather than sample materials for approval.
- 8.03 The design of the solar shading devices within the elevational treatment does not appear to respond to the orientation of the elevations. This could significantly reduce their effectiveness in limiting unwanted solar gain. On the north elevation their adoption appears vulnerable to potential removal during any value engineering exercise, as they serve no legitimate solar control function. The façade facing east onto the train station is close to the boundary, and the choice of materials and the amount of glazing will be limited by fire safety considerations. It is extremely unlikely that a fully glazed façade as drawn would meet Building Regulations requirements, and fire brigade access is potentially restricted.
- 8.04 The entrance to the tunnels and the relationship with the building should be reconsidered. The tunnels proposal should be incorporated within the drawing set so that the relationships and spaces around both can be clearly understood by potential occupiers of the units; by the community that will use it; and any public organisations that will potentially be funding the tunnels project.
- 8.05 There is insufficient landscape design information to illustrate how trees and landscaping will be incorporated. How, for instance, are trees grown in the podium level above the car parking? The section drawings show none of the tree pits and planting depth that would be expected. Trees are shown all around the perimeter of the building, including the east side where we understand there is a services easement. These observations, and the comments regarding landscaping in heavily overshadowed areas, suggest that the landscape and public realm design has not been thoroughly considered.

### 9.00 Conclusions

- 9.01 This project occupies an important position on a strategic route close to the city centre. By virtue of its proximity to the rail station it will strongly influence the first visual impression of the city for some visitors. Further it straddles an important transition from one city area to an established residential community of entirely different scale. The physical relationships are further complicated by level changes and easements.
- 9.02 The proposals do not adequately address these considerations or the more detailed integration of the existing project proposed for the 'tunnels'.
- 9.03 Further, the information provided does not adequately describe the relationship with surrounding physical context or the neighbouring community. There is a single extended section drawing, but otherwise no scale drawings which adequately show the surrounding context. There is similarly a lack of material that adequately represents the buildings as they would be seen from the south, or as they would be seen at the approach to the station, or as one emerges from it. The treatment of the public realm is considered to be either difficult to access, in the case of the sunken 'street', or inappropriate in the case of the podium garden.
- 9.04 The buildings are bulky and unrefined and will probably be overbearing when viewed from the south. The architectural treatments, as described, are not sufficiently refined or accomplished to overcome this concern.
- 9.05 Although the proposed office use may be acceptable in planning policy, we consider that the potential benefits of a mixed-use proposal, including employment space; private and affordable homes; and street facing shops and facilities, should be considered. A mixed-use proposal could improve activity (and security) throughout the day and beyond 'office hours' and would create the potential for a finer grained approach to the architectural design and massing. It would be more appropriate for the site, and would suit the regeneration aspirations of the area better, as well as the rejuvenation of the city as a whole.

**Richard Partington, Chair of the Design Review Panel, MAG Expert Advisor**

### APPENDIX

This section outlines the information that could have been provided or updated during the period of the application's consideration, either to explain the relationship with the proposals surroundings and context, or so that consultees and the general public could have had a better understanding of the changes made after the application was first submitted.

#### Roof drawings

- A1 Roof plans including details of roof plant enclosures, projections above the roof line (for instance lift overruns), air-handling equipment and chilling/cooling equipment. The maximum height of the building indicated on drawings should make proper provision for roof build-ups, plant enclosures and equipment.

#### Context

- A2 Visual or graphical analysis of the wider site, the space around the buildings and the changes in level in a way that can easily be interpreted by planning officers and the general public.

#### Cross sections

- A3 Accurate sectional drawings that show the make up of floor constructions, the roof build up, including insulation, upstands etc and the maximum height of roof plant and enclosures above any parapets or copings. The sections that are produced provide limited information and do not necessarily indicate the worst case.

#### Detailed descriptions of materials

- A4 Specifications and drawings at a sufficient level of detail and large enough scale to show joints, panel subdivisions and setting out, glazing details, cappings and general construction. The quality of the proposal, clad as it is in glass and metal panels, will depend very much on the quality and detail of its design and construction. An assessment of the design quality is not possible from the diagrammatic information provided on the elevation drawings.

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### Street context drawings

- A5 Extended drawings that show the scheme in relation to the surroundings, for instance an elevation to East Bridge Street showing the relationship with the station.

### Neighbouring uses

- A6 Plan drawings that show the detail of the 'tunnels' project in relation to the lower ground floor plan and extend northwards to show the connections with Lanyon Place.

### Information to describe the changes made post submission

- A7 Updated views and an updated design and access statement that show how the proposal was amended after consultation.
- A8 The planning service's design consultee appears to have accepted alterations made after design advice had been sought, but the wider consultees including neighbouring residents would not have been able to assess the differences without a document such as the design and access (D+A) statement being updated.
- A9 The D+A is the record of the evolution of the design, and is intended to be the illustrative document that explains the design intent to the wider public. For major applications, it is good practice to request this to be updated as the design develops.

### Contextual views from critical positions

- A10 Given the level of interest and subsequent objections from the Markets community to the south, it is regrettable that views from various vantage points south of the site were not produced to illustrate the impact on this area. The shadow studies demonstrate that homes will not be overshadowed by the development, but this study does not provide any sort of visual analysis (how much of the building will be seen), nor does it consider other objective measures such as the change to the 'no-sky line'.