



MINISTERIAL ADVISORY GROUP
FOR ARCHITECTURE AND THE BUILT
ENVIRONMENT FOR NORTHERN IRELAND

**Belfast City Council Consultation –
Draft Linen Quarter Public Realm Analysis & Vision**

MAG Response

7 | 3 | 16

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Ministerial Advisory Group (MAG) Response

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By email to:

development@belfastcity.gov.uk

1.00 General

- 1.01 MAG was established in 2007 to advise the Minister for Culture, Arts and Leisure on the implementation of the Architecture and Built Environment Policy.
- 1.02 MAG welcomes the opportunity to comment on the draft Linen Quarter Public Realm Analysis and Vision, and would advise as follows.

2.00 MAG Response

- 2.01 MAG's response is given below, as per the format of the online survey, for ease of reference.

Q1

What organisation do you represent?

**THE MINISTERIAL ADVISORY GROUP FOR ARCHITECTURE AND THE BUILT ENVIRONMENT
FOR NORTHERN IRELAND**

Q2 ***Have you any comments on the Executive Summary section 1.0, in particular the key interventions? The interventions are: introducing new public spaces; redefining streets and promoting a different street hierarchy; retaining and building upon the area's import built heritage; and setting guidance for new building and associated public realm.***

These proposed interventions are all physical. Belfast needs to learn to use what it already has rather than constantly strive for physical change in the false expectation that this will necessarily improve how we use places and how the places affect our quality of lives, contribute to the relief of poverty, create equality and social inclusion.

Purely physical techniques have been used before in Belfast and have not achieved the desired results, in spite of having spent tens of millions of pounds (£28 million on one phase of one scheme).

“Lighter, quicker, cheaper” interventions such as those advocated by the Project for Public Spaces in New York have been proved internationally to achieve far more and to establish sustainable, cost effective ways to involve the greatest resources available to society – local people and their passions.

The report acknowledges the difference between the study area's physical features - its architectural coherence, scale and grain – and its social features such as land uses, history; past events and associations. As well as identifying land uses, history, past events and associations, the report could add value by identifying current events and activities, including the many festivals and cultural programmes available in the area as well as the passionate communities of interest who initiate and manage them.

The report could specifically acknowledge the importance of local people, working, living and socialising in the area. It could identify the passionate communities of interest in and around the area. The highly talented and dedicated actors, artists, musicians, broadcasters, lawyers, church people, office managers, professionals, workers, central and local government officials are presently omitted from the report. Passionate communities of interest within and beyond the immediate area, Belfast Civic Trust, PLACE, Ulster Architectural Heritage Society, Belfast Metropolitan Residents Group and others have a huge amount of knowledge and a continuing dynamic interest in the area yet their contributions and potential for greater local

inputs have not been referred to in the report. The report could also articulate practical ways in which local people and councillors representing the Ward and District Electoral Area could contribute to the future success of the place. Currently, the only passionate community of interest identified is that of the authors, telling readers *"we are passionate about our craft."*

The authors and commissioners of the report could ensure that it identifies, nourishes and encourages the passions, in the city and beyond, that will regenerate this place. These include the involvement of children and young people in Belfast as a "child-friendly" city. Older people (a reportedly growing sector of the population) often feel isolated from the city centre, finding it confusing and busy, not a place where one would choose to spend time. Imtac is a Belfast based committee of disabled people and older people as well as others including key transport professionals whose October 2012 report, "Highlighting barriers in the pedestrian environment" states

"From the work we have undertaken we have found that many disabled people and older people find the current pedestrian environment a hostile and hazardous place."

A report of this nature could include documented evidence of what is available, suitable – and preferably free to use – for different age and interest groups in the study area.

Immediately adjacent, for example, in the City Hall, there are regular free guided tours, recently extended to seven days a week. In the heart of the study area, the Ulster Hall regularly offers free concerts. Analysis of the study area may show that there are further attractions which are available at no cost to the visitor of whatever age. These include guided walks and tours, sometimes with free access to buildings including churches and their activities for different ages and interest groups that are regularly available, with a wider choice of destinations on European Heritage Open Days. Research for the report would undoubtedly reveal other attractions for a range of people and interests. The report could include specific opportunities that already exist and could be enhanced or added to, thereby generating additional resources with and by children, young people and older people. People with disabilities who wish to use the area would be disappointed if this hundred page report were content to discuss their special needs and opportunities by a sole reference on a map on page 28 to five parking spaces designed and reserved for disabled people. Opportunities for people who feel socially excluded because of poverty or other issues could be described. People who may be treated unequally because of their gender, ethnicity, sexuality or other reason will look to the report for an understanding of their needs and potential offers to the study

area. All these are the people who can animate a place. Researching and recognising them and their special interests provides an opportunity to improve the place for all, now and in the future, sustainably.

Research in urban areas in Sweden and USA indicates that people are mainly attracted by.... people. It is not important whether or not they spend or generate money in a place – their very presence improves the locality immediately.

Introduction

Q3(a) Do you understand how this document fits with the other city centre plans and existing planning guidance as set out in section 2.1 - 2.6? (please tick the box that most closely matches your answer)

**Not at
all**



Q3(b) Have you any comment or suggestion for improvement?



Yes

If yes, please state your comment or suggestion for improvement

The study area report refers to a very limited range of strategic guidance documents. It could refer to vital and relevant information such as the Strategic Planning Policy Statement published in September 2015 and supplementary planning guidance including 'Living Places – an Urban Stewardship and Design Guide for Northern Ireland' adopted in September 2014. Previously the only guidance available in Northern Ireland for other than housing developments (reference DoE's 'Creating Places') was the Design Manual for Roads and Bridges as cited in Development Control Advice Note DCAN 15 Vehicular Access Standards. However, MAG understands that Transport NI is now using Manual for Streets 2 and it would be helpful if the current guidance were researched, referenced and discussed for applicability in achieving any implementation of the report's recommendations for street design.

The report could acknowledge the government's Architecture and Built Environment Policy. The briefing review and design review service provided on a regular basis by the DCAL Ministerial Advisory Group (MAG) as part of the Policy could be referred to since the report advocates a City Design Panel.

The guidance on opportunities for investment provided by The Northern Ireland Guide to Expenditure Appraisal and Evaluation (NIGEAE) encourages creativity in public projects, describing many opportunities that could helpfully inform the report, including guidance on:

- early consultation
- building in flexibility from the start
- pilot studies
- radical options
- activities as well as projects
- varied timescales
- recurrent as well as capital expenditure.

Analysis

Q4(a) Do you agree with our summary of the Linen Quarter's main assets as set out in section 3.15? (Please tick the box that most closely matches your answer)

Not at all



Q4(b) Have you any comment or suggestion for changes?



Yes

If yes, please state your comment or suggestion for changes

The assets identified are entirely physical and land use assets. The report could present evidence of research into the human assets in the area, which offer the fundamental and sustainable means to improve the place. The report talks about animating the space and could helpfully discuss the potential animators. It was prepared following 'members of the team visiting the Quarter and broader city over the last few months, gaining an understanding of how the buildings, streets, spaces and places work, and how locals and visitors respond to them.' The report could usefully describe the team members' interaction with, and learning from, the locals and visitors who use and respond to the places, together with any surveys or other information obtained during the study.

'Action learning', 'connecting' and 'aligning' are techniques of civic stewardship as reported by MAG. Stewardship is part of the reformed planning system in Northern Ireland, and could most helpfully be included in the report.

Q4(c) Do you agree with the opportunities that we have identified in section 3.15? (please tick the box that most closely matches your answer)			
Not at all			
<input checked="" type="checkbox"/>			
Q4(d)	Have you any comment or suggestion for changes? <table border="1" style="float: right;"> <tr> <td><input checked="" type="checkbox"/></td> <td>Yes</td> </tr> </table>	<input checked="" type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Yes		

If yes, please state your comment or suggestion for changes

The opportunities defined are exclusively for physical change, without presentation of any evidence in support of the proposals, the need for them or their definitive benefits. Even the provision of opportunities to sit and relax implies physical rather than social change. Local communities and passionate communities of interest could be a significant part of the future of the place and the report could describe any opportunities the authors created for people to experience the potential for change. Indication too that people have been asked about its future would be helpful. Encouraging more active uses to promote activity and street life would greatly benefit from reports of having interacted with people who use or may use the place. The contributions of actors, musicians, lawyers, broadcasters, central and local government officials, commercial and professional managers, staff, children, young people, unemployed and retired people, together with church people and residents of the area, could be included in the report. The report's aspirations could be informed by explaining why the cafe closed in the Ulster Hall or why the Ormeau Baths Gallery is no longer a gallery. The report's proposals for physical change to sustain the area as *"the premier office destination within Belfast"* could be reinforced with evidence, particularly when it is in direct competition with brand new Grade A office buildings and already approved future developments in Donegall Quay, Titanic Quarter and Royal Exchange, for example.

Q4(e) Do you agree with the themes for improvement that we have identified in section 3.15 (please tick the box that most closely matches your answer)	
	Not at all
	<input checked="" type="checkbox"/>
Q4(f)	Have you any comment or suggestion for changes? <input checked="" type="checkbox"/> Yes

If yes, please state your comment or suggestion for changes

The five themes for improvement appear to have been invented without reference to policies which have been put in place as part of planning reform. The ten qualities described in Living Places, for example, could be used as the basis upon which to assess the present and consider the future of the study area, thereby relating it directly to the Strategic Planning Policy Statement which recognises the importance of urban and civic stewardship in planning and placemaking.

Q5(a) Do you agree with our design drivers and initial proposals for Vision Objective 1 - enhance the arrival experience as set out in section 4.2? (please tick the box that most closely matches your answer)

Not at all



Q5(b) Have you any comment or suggestion for changes?

Yes

If yes, please state your comment or suggestion for changes

“Design drivers” is jargon. The study area is not a discrete area; its delineation does not even match the designated Linen Conservation Area. It is a part of Belfast’s compact city centre. Whilst it has historic associations with linen, it would be difficult to find a piece of linen there today, let alone buy linen or visit a gallery explaining its relationship with the study area. There are many ways to arrive in and depart from the study area, whether by bus, car, walking or cycling in addition to the Transport Hub. Indeed the entire city centre area is a transport hub, with train stations, bus stations, bus stops, cycle ways, car parking, footways and streets forming a set of connections that go well beyond the Transport Hub. The currently proposed route of the proposed rapid transit system, for example, is along the northern edge of the study area and any positive and negative aspects of this for the study area could be referenced. People enter and leave the study area because they have reasons to do so, not because of any physical ‘arrival experience’. The report offers no reason to draw people into the city across Great Victoria Street; people may be there for many reasons that will affect their choice of whether or not to cross the street.

The way to increase pedestrian priority while retaining traffic flow is to change behaviour. Whilst physical design is acknowledged to create different behaviour, it needs leadership and support from behavioural design. This includes regulations and codes, such as speed limits and the Highway Code. Whilst it is acknowledged that these are not within the control of the authors or commissioners of the report, they are important aspects of the context which the report could acknowledge. Connections with the City Hall have already been changed by the introduction of preparatory measures for the rapid transit system, specifically bus lanes, bus gates and additional traffic signals. None of this would be necessary if behaviour were to be modified. The rapid transit priority measures which have been put in place by DRD are currently being used by buses. They have produced a different dynamic on the northern edge of the study area, creating wide open streets without any vehicles in them for appreciable periods between changes of traffic signals. These open streets create opportunities for people to walk across, to and from City Hall or the Ulster Hall for example, often without any reference to the traffic signals but instead using their senses to perceive the volume and speed of traffic. The traffic speed is far from constant because as motorists approach the signals they want to catch the green light and there is a tendency to speed up, with associated danger to people crossing in the wide open spaces. The traffic in this small area is already over-regulated and over-engineered, causing frustration among drivers and

consequential poor behaviour. People will not stand waiting at the kerb when there is obviously no traffic but then may be surprised by traffic arriving sooner and at a higher speed than expected. The report could acknowledge the 20mph speed limit which has recently been applied in the area and assess whether it assists in providing steadier, slower traffic flows. The report could usefully acknowledge that improved behaviour and thus a better pedestrian and cycling environment may need to be encouraged with education in the initial stages together with enforcement that explains the sound reasons for the reduced speed limit.

The Northern Ireland (NI) Highway Code is insufficiently clear on a hierarchy of priority but it is a devolved matter and is scheduled to move from Department of Environment to Department of Infrastructure. There could therefore be an opportunity for the client, perhaps as part of Community Planning, to encourage a review of Highway Code to allow it to reprioritise pedestrians, cyclists and public transport above private vehicles and to include important aspects of the art of placemaking which are not in the current Northern Ireland (NI) Highway Code but are included in the Great Britain (GB) edition, such as Home Zones and Quiet Lanes.

Rule 206 in the GB Code includes:

“Drive carefully and slowly when

- in crowded shopping streets, Home Zones and Quiet Lanes (see [Rule 218](#)) or residential areas
- driving past bus and tram stops; pedestrians may emerge suddenly into the road
- passing parked vehicles, especially ice cream vans; children are more interested in ice cream than traffic and may run into the road unexpectedly
- needing to cross a pavement or cycle track; for example, to reach or leave a driveway. Give way to pedestrians and cyclists on the pavement
- reversing into a side road; look all around the vehicle and give way to any pedestrians who may be crossing the road
- turning at road junctions; give way to pedestrians who are already crossing the road into which you are turning”

Rule 218 in the GB Code states

“Home Zones and Quiet Lanes.

These are places where people could be using the whole of the road for a range of activities such as children playing or for a community event. You should drive slowly and carefully and be prepared to stop to allow people extra time to make space for you to pass them in safety.”

Rule 206 in the NI Code includes:

“Drive carefully and slowly when

- in crowded shopping streets, Home Zones and Quiet Lanes (see Rule 218) or residential areas
- driving past bus and tram stops; pedestrians may emerge suddenly into the road

- passing parked vehicles, especially ice-cream vans; children are more interested in ice-cream than traffic and may run into the road unexpectedly
- needing to cross a footway, footpath, cycle lane or cycle track; for example to reach or leave a driveway. Give way to pedestrians on the footway or footpath and to cyclists on the cycle lane or cycle track
- reversing into a side road; look all around the vehicle and give way to any pedestrians who are already crossing the road into which you are turning"

The NI Code is more specific about when to give way to cyclists – in GB the Code states “Give way to pedestrians and cyclists on the pavement” whereas NI Code states less generically, “Give way to pedestrians on the footway or footpath and to cyclists on the cycle lane or cycle track.”

Importantly, bullet point 6, the GB instruction to “Drive slowly and carefully when turning at road junctions; give way to pedestrians who are already crossing the road into which you are turning” does not exist in Northern Ireland Code. The report could recognise the importance of such Code changes in affecting the sociability and enjoyment of city centre places, leading to their population and animation. The client, through Community Planning, could influence the relevant authorities.

Home Zones and Quiet Lanes do not exist in Northern Ireland.

Rule 218 in the NI Code states

“Home Zones and Quiet Lanes (Great Britain only).

These are places where people could be using the whole of the road for a range of activities such as children playing or for a community event. You should drive slowly and carefully and be prepared to stop or allow people extra time to make space for you to pass them in safety.”

In both GB and NI versions of the Highway Code, Rule 223 states

“Buses, coaches and trams.

Give priority to these vehicles when you can do so safely, especially when they signal to pull away from stops. Look out for people getting off a bus or tram and crossing the road.”

Experience from elsewhere would suggest that this rule works well with trams where they have been installed. However, local experience suggests that priority for buses and coaches is not sufficiently understood or facilitated by drivers. Creating a higher awareness of the rule in relation to buses and coaches, by discussion with Transport NI and DoE Road Safety on education and enforcement through Community Planning, could be part of the movement towards emphasising the hierarchy. MAG considers this to be good placemaking and stewardship practice.

The Imtac 2012 report states

“It is common in transport planning to talk about a road user's hierarchy where pedestrians should be placed at the top. Our report indicates that there remains a huge gulf between a notional hierarchy with pedestrians at the top and the day to day experiences of pedestrians in Northern Ireland.”

MAG reported to DRD in November 2014 on the hierarchy in its response to the Bicycle Strategy.

<https://www.dcalni.gov.uk/sites/default/files/publications/dcal/drd-consultation-draft-bicycle-strategy-for-ni-mag-response.pdf>

“In many instances, MAG finds the tendencies to provide hardware “solutions” to software problems or opportunities. Developing and simplifying the software – in this case the proposed hierarchy is a powerful piece of software – is essential. Designers and assessors of proposals should have the hierarchy in mind when verifying or checking schemes. The hierarchy can be summed up as “lighter, slower, public before heavier, faster, private”, or Chairs, Feet and Pedals first, then Motors.

- Priority 1. Chairs (wheelchairs, push chairs)
- Priority 2. Feet (walking, running, horses, pets)
- Priority 3. Pedals (bicycling and tricycling of all sorts)
- Priority 4. Motors (first public transport, then service vehicles, then private cars).

The hierarchy could be introduced to new and returning drivers by embedding it in the Highway Code and in the Driving Licence Theory and Practical Tests. Improved rules, clearly stated and backed by good legislation, are important but enforcement is required to produce the cultural change necessary to achieve the vision, which MAG endorses, that “.....all road users can safely share space with mutual respect.””

Q5(c) Do you agree with our design drivers and initial proposals for Vision Objective 2 - develop new street typologies as set out in section 4.3? (please tick the box that most closely matches your answer)

Not at all



Q5(d) Have you any comment or suggestion for changes?

Yes

If yes, please state your comment or suggestion for changes

'Design drivers' is jargon. A "Raised tree pit" as indicated on the drawing does not allow for flexibility. Such raised pits have been removed from public realm in city centre Belfast because of misuse for disposal of rubbish. They require high levels of maintenance. The report indicates that 'Dwell' is to be accommodated on east-west streets; as noted elsewhere in the response, people with time to dwell, particularly older people and children who may be economically less active, have not been included in the report and presently do not find the city centre attractive. People come to the city centre, however, in tens of thousands when activities such as "Culture Night" occur, providing local evidence that there are successful methods to attract people. These issues could be positioned at the heart of the report.

The report seeks to encourage opportunities for uses to spill out yet does not indicate any way to increase the uses, other than aspirations. Evidence could be provided, based on actual research about what kinds of uses Belfast people and visitors will actually create. Civic stewardship techniques have shown how experiencing new ways to use streets and places can inspire people and create the appetite to change regulation and legislation to allow this to happen. The report could provide evidence for its statement that there needs to be greater movement along east - west streets, facilitated through encouraging uses and users to dwell and spill out onto these quieter side streets. Movement implies that people need to go to places and the report would need to demonstrate that this can be promoted by paving solutions. The report claims that this will be an important element in helping to reanimate the streets within the study area and encourage a diversity of uses that can add to the vibrancy and mix. It would be good, and necessary, to include actual local evidence for this statement from stewardship techniques such as action learning.

MAG agrees with the promotion of a shared space carriageway, however it is expensive to provide and the report should provide evidence based on other similarly dimensioned local shared space carriageways in Belfast (for example, Montgomery Street) to determine the actual effects of such arrangements on

footfall, creative use and enjoyment of the spaces. While reduced crossing distances at junctions are beneficial, the most important determinant of junction safety and pleasure in use is the behaviour of other users of the junction. A narrow carriageway where traffic is still moving quickly and discourteously is not an improvement. The report advises Belfast to "reinforce street trees" and it could make clear what this means. Tree pits have been discussed above. The report advises that the streets should retain a proportion of on-street parking and in support could usefully provide evidence of research into car parking in the study area.

The area already has a simple palette of materials and evidence would need to be produced to show that granite, etc, creates better walking, pram pushing, wheelchair, scooter and cycling experiences than the present smooth surfaces. Many new public realm schemes in Belfast have created steeper, less consistent and more dangerous slopes with new paving (particularly when icy) than existed with the previous smooth surface and have created trip hazards because of the use of small paving units which can be easily displaced (for example by loads from heavy vehicle tyres).

The report states that the east-west streets need to be redesigned in order to help cross movement through the study area. It could provide evidence that redesign is needed and emphasise that criteria / briefing for designers should be based on facts rather than assuming that designers are experts. The initial proposals suggest physical redesign whereas the most effective way to bring people into a place is to create reasons to go there. Paved streets are not a reason for which research evidence has been presented in the report. Culture Night, for example, has proved itself to be a reason to go in to the city centre. Pedestrian priority while allowing vehicle movement and car parking can be provided by a regulation by DRD which the report could suggest initiating through Community Planning. After success is proven by testing pedestrian priority on the existing surfaces, new paving could follow, as 'form follows function'.

The aspiration to have a continuous carriageway building to building is good but it is not an initial proposal, it is a physical design proposal that could follow people's behavioural change which is achieved by other means such as regulation and encouragement by DRD as noted above, facilitated through Community Planning. Tree planting and on-street parking already exist within the street. No reason is given why a 5.5m carriageway is specified for vehicles. Vehicles are accommodated at present. Traffic speeds are not controlled by trees alone, but by education, regulation and enforcement leading to improved habits. Yet the report suggests that trees be positioned to slow traffic speeds. The proposed simple materials palette can come later, once the new uses have been established and monitored. Initial work can include temporary painting and planting of road junctions, involving artists and gardeners. Successful testing has already been carried out in America by City Repair and pilot studies could be carried out in the study area to test applicability to the study area.

“City Repair facilitates artistic and ecologically-oriented placemaking through projects that honor the interconnection of human communities and the natural world. The many projects of City Repair have been accomplished by a mostly volunteer staff and thousands of volunteer citizen activists.”

The junction and street improvements could be encouraged during the consultation process itself and their implementation could be aligned in real time with current work in Portland Oregon where a call for proposals closed on 14 January 2016. Such direct involvement could create a transatlantic enthusiasm for connecting citizens and their places in a sustainable way. The work in America proves that it does not all have to be done by statutory bodies. The study area could be used to encourage people to genuinely, actively and practically involve themselves in these pilot studies now and not leave everything to the budgets of City Council, DRD, DSD or their successor departments. <http://www.cityrepair.org/>

Q5(e)	<p>Do you agree with our design drivers and concepts for Vision Objective 3A - new space as set out in section 4.4? (please tick the box that most closely matches your answer)</p>				
	<table border="1"> <tr> <td data-bbox="331 349 459 472">Not at all</td> <td data-bbox="459 349 1361 472"></td> </tr> <tr> <td data-bbox="331 472 459 542"><input checked="" type="checkbox"/></td> <td data-bbox="459 472 1361 542"></td> </tr> </table>	Not at all		<input checked="" type="checkbox"/>	
Not at all					
<input checked="" type="checkbox"/>					

Vision

Q5(f) Have you any comment or suggestion for changes?	<input checked="" type="checkbox"/> Yes
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If yes, please state your comment or suggestion for changes

'Design drivers' is jargon. 'Concepts' are presented without evidence. Blackstaff Square is hardware. Hardware functions when compatible software is introduced. The report proposes investment in new hardware when no software exists for the present hardware. The report could helpfully include proposals for the stewardship – active caring – for the Square. This could be tried out now as part of the reporting and consultation processes.

MAG has clear evidence of an example in a town in Northern Ireland where public money was spent on new public open space using substantial natural stonework, copper roofs, lighting, storage, toilets, raised staging and disabled access but without any consideration of programming, stewardship or management. The failed result is now being considered for demolition because it is alleged to encourage anti-social behaviour, yet within a few metres of the hardware there are very active performance groups who have not been connected with the open space and have been discouraged by government from using it creatively for reasons of "insurance".

Instead of proposing new hardware, the report could design and implement experimental and experiential software in the existing Square, work with users to learn from the new uses and produce a brief for future physical changes to improve the opportunity for good stewardship and rewarding experiences in the Square. It is particularly relevant that bars and a hotel adjoin the Square at present yet these surrounding businesses have not been drawn into the space. The report could usefully tell its readers why this is the case.

'Action learning by doing' is an acknowledged civic stewardship method to try out new uses, involve more people and achieve a brief that enhances the opportunities for events, activities and uses that would then have a proven success record in the area to inform design proposals, form following

function rather than being invented by a designer.

Proposing new plans and new uses without trying anything is not likely to succeed; the likely outcome from past experience, including in Blackstaff Square, is a newly shaped place that continues to be underused (or worse, damaged and derelict) because local communities and passionate communities of interest are involving themselves elsewhere.

Q5(g)	Do you agree with the design drivers and concepts for Vision Objective 3B - new focal space as set out in 4.4? (please tick the box that most closely matches your answer)
	Not at all
	<input checked="" type="checkbox"/>
Q5(h)	Have you any comment or suggestion for improvement?
	<input checked="" type="checkbox"/> Yes

If yes, please state your comment or suggestion for improvement

The proposals in 3B are not rooted in evidence. There is no history of use in the immediate area that would confirm or even suggest that a space like this will be a success. Appropriate action learning events could be undertaken with local communities and passionate communities of interest, initiated by the consultants or the clients for the local area study. These would prove or disprove the possibility and viability of activities and could lead to a well considered and detailed brief for designers to respond to.

No evidence is presented of the need or appetite for a new destination space within the Quarter, yet the report recommends its creation. The need for the introduction of a green space is similarly unproven and undocumented. The report states that there is "need for an outdoor room", without producing any evidence of need whatsoever, or even telling the reader what an outdoor room is.

Belfast's real need is to learn how to use its existing outdoor spaces well. Private owners and neighbours, passionate communities of interest, local people and traders can involve themselves now if suitable arrangements are made to facilitate them. If no suitable arrangements can be made now then it is not likely that they can be made after resources have been spent on physical rearrangements. In order to convince any investor (public or private), proposed activities could be proved to work and their sustainability could be confirmed by either self-sufficiency in funding or proven access to recurrent funding from recognised and sustainable sources.

The report could provide evidence for its proposals for "optimising the façades and frontages of existing buildings" and indicate how this will take place. The proposal for "attractive and richly planted beds" will incur heavy recurrent costs unless volunteers and / or sponsors can be encouraged to participate. The report could tell us how this can be done. MAG has reported on the 300 local people who became "friends" of the Walled Garden in Bangor before its refurbishment began,

revolutionising the use of the garden and ensuring its popularity. The example of the Council's attractively planted beds at Buoys Square in the northern part of the city centre could be studied to see whether they provide public benefit. The study could report on these to see whether need can be proved. The capacity of beds to inspire additional activities and trade in the study area is not documented, although there is firm evidence that John Lennon and Yoko Ono's presence in a bed drew the crowds, as did Tracey Emin's Unmade Bed.

There is no evidence that a curved, dual sided feature bench will attract people – if something of this nature were to be provided and assessed on a temporary basis, perhaps by setting out some seats or benches in a similar configuration, then if it is successful a future opportunity may arise to provide it as part of a design brief or artist commission. The advice, however, from the Project for Public Spaces in New York is that people prefer movable chairs and tables that they can arrange to suit changing social needs and group sizes as well as the weather, sunlight and time of day or night. Movable tables and chairs can also be relocated to allow flexibility for other uses, or brought inside at night and during periods of poor weather to one or more of the Council's buildings. There is no evidence that a raised deck will allow flexible uses – there is no evidence in the report that any uses will come to a raised deck and by its nature it reduces rather than increases or allows flexibility; the unsuccessful town square in Northern Ireland described above had a raised area to encourage performances but no management system to provide them.

On level city centre ground, the proposals to introduce a raised walkway and a gently rising lawn reduce rather than increase flexibility of use of the space. The report criticises the arrival from Great Victoria Street because of its level changes but proposes, without giving any reason, to artificially create level changes in the study area. The proposed curving avenue of street trees is not claimed to have any particular use or value and while the proposal for a narrowed carriageway to ~ 6m (2 way maintained), introducing street trees, may increase the size of the area available for "other uses", no "other uses" are proposed and none has been demonstrated by the report to be viable. If there is a need to reduce the carriageway, legislation in Northern Ireland allows DRD as the road authority to do this on a temporary basis, with paint and planters for example, to accommodate the proposed "other uses" on a trial basis for assessment. It would be good for people to see and engage with the "other uses" in action during the consultation period so that they can respond to these from actual experience of them.

Q5(i) Do you agree with our design drivers and initial proposals for Vision Objective 4 - make the most of the unique building stock as set out in section 4.5? (please tick the box that most closely matches your answer)

Not at all



Q5(j) Have you any comment or suggestion for changes? **Yes**

If yes, please state your comment or suggestion for changes

The proposals for multiple uses of buildings are welcome and reflect some existing examples in the study area where leisure, commercial and retail functions have been introduced alongside office and residential uses. However, regulations concerning fire separation and protection have made such opportunities difficult and expensive to achieve and the report could provide evidence of agreement reached with Belfast City Council Building Control on the scope for mixed uses in relation to stair and lift access, means of escape, etc.

The report could challenge perceptions that "living over the shop" (or office) is a second class option for people with choices. Uncertainty about safety and how to provide it in the city centre at night together with the management of noise during the early hours of the morning have all had negative impacts on similar proposals in Belfast city centre and means to overcome these could be addressed in the report. Some previous attempts to introduce housing over commercial premises failed to be implemented following advice from estate agents. The report could offer early and detailed research indicating how to overcome this too.

Q5(k) Do you agree with our design drivers and initial proposals for Vision Objective 5 - provide a framework for new buildings as set out in section 4.6? (please tick the box that most closely matches your answer)

Not at all



Q5(l) Have you any comment or suggestion for changes?

Yes

If yes, please state your comment or suggestion for changes

At the root of poor, single function buildings and places is the perceived set of risks that apply to owners and occupiers of city centre premises. The report notes that a significant number of local government departments occupy premises in the study area. Local and central government are not content to allow their offices to be located above shops or restaurants, for example, or below residential accommodation. Government wants “basement to roof” control. Government does not normally open its buildings beyond traditional office hours and leaves them virtually empty on weekends. This is an important software / management consideration. MAG is aware of one example of a council owned building in another town where there is a trusted arrangement between an arts group and the council so that the arts group can have a key to open and close the building at times beyond the normal 8.00am to 6.00pm flexitime working week. Churches give keys to community groups and specialised organisations to use their buildings out of hours.

The report could create opportunities by recommending workable arrangements for the use of these buildings, particularly the ground floors of public buildings and especially those under the control of the client. Without clear guidance on workable arrangements, the report's aspirations for multiple uses are not likely to be realised.

The proposed framework for new buildings needs to be informed by design expertise. The initial proposals in the document do not add substantially to the guidance which is given in the Linen Conservation Area document published by the Department of Environment in December 1992 that covers most of the study area.

The report's aspirations to affect the design of buildings by proposing the creation of a “city design review” panel could acknowledge that briefing review and design review are already available through the Ministerial Advisory Group (MAG) in the Department of Culture, Arts and Leisure, currently located within the study area, at Causeway Exchange. MAG

consists of a Chair, eight members and some twenty expert advisors with a multi-disciplinary range of expertise including art and architecture, landscape, conservation, sustainability, urban design, planning, transportation, civil engineering, archaeology and ecology.

The report recommends City Design Review and shows photographs of Sheffield design review but presents no evidence that the report itself has been subjected to peer review. Belfast City Council is aware of the Policy for Architecture and the Built Environment and MAG's provision of briefing review and design review, which are available on request at any stage from inception to publication (MAG's experience would suggest the earlier the better). Early reviews of briefing and design of the report would have ensured that on publication it would have more closely met strategic planning, architecture and built environment policies.

Conclusions

Q6(a) Do you agree with our conclusions as set out in sections 5.1-5.7? (please tick the box that most closely matches your answer)

Not at all



Q6(b) Have you any comment or suggestion for changes?



Yes

If yes, please state your comment or suggestion for changes

These assertions of a need for investment in physical change could be proved or disproved experimentally by rapid and inexpensive temporary changes, including during the consultation period, to the street environment using, for example, painting and planters to emphasise the priority for people on foot rather than in vehicles. These opportunities fit well with the Creative Consultation Toolkit designed by MAG with SIB, the Strategic Investment Board for Northern Ireland, which is available at <http://toolkit.creativityni.org/>. The report does not mention resolution of placemaking with the proposed rapid transit scheme; most emphasis is given to the future "Hub" but this does not account for people arriving now or in the future by other bus services, taxis, cars, walking or cycling.

Until Belfast learns to use, manage and steward its existing open spaces well and until they are busy at different times of the day and night, weekday and weekend, winter and summer, it is not resource effective to produce more civic open spaces. Events and activities can be proven or disproven by temporarily closing a place to traffic without making any physical changes. Examples occur regularly at the concerts / rallies / Christmas lights switch-ons at Donegall Square North, where traffic is removed from the streets for a period, just one block north of the study area. Further examples would include Culture Night which is presently focused in the northern part of the city centre, bringing some 50,000 additional people in to the city centre *without any physical change at all*. Another very modest example is described in a paper produced by Dr Saul Golden of Ulster University which describes the temporary closure of Library Square to all but essential traffic to allow people to respond experientially to the public consultation for its physical redesign. The paper is at <http://uir.ulster.ac.uk/30296/1/Golden-2014-doi102495-SC140371.pdf>

The aspirations of this section can be tried out without expensive changes and in collaboration with software changes that prioritise movement on existing surfaces – removing one way traffic systems, for example, and providing 'priority direction' routes instead. People walking can be given priority at a junction. This can be a temporary arrangement as a pilot study to assess the effects on vehicular

movements. The work of City Repair could be referenced here, brought to Belfast even in synchronised real time with Portland Oregon and used to prove or disprove the theories of shared space that the report espouses.

<http://www.cityrepair.org/eliot-crossing>

Street dressing can occur temporarily to experiment and see whether change is desired or not, once it has been experienced by people using the place. Instead of aspiring to uses that "spill out", their potential can be assessed in reality, by live experiment, before investing in new public realm and then discovering the real issues, too late.

Commercial Court is illustrated alongside the aspiration for a balance of uses and indeed multiple use of space. The report could investigate, acknowledge and describe the endeavours and arrangements that have been put in place to achieve the results in Commercial Court so that others contemplating similar uses in the study area could learn from local precedents. The report could include appropriate description of how Commercial Court works and a summary of learning along with the photograph.

The buildings are protected in a Conservation Area and the report could have included reference to the Judicial Review of proposals to demolish the Athletic Stores building, just two blocks north of the study area, in an adjacent Conservation Area. This would have been helpful as a precedent to assist in maintaining the buildings in the Conservation Area.

Detailed guidance exists in the Conservation Area and could be referred to.

http://www.planningni.gov.uk/index/policy/supplementary_guidance/conservation/conservation_map/conservation_linen.htm Review of briefing and design is

available through the Ministerial Advisory Group (MAG) reference

<https://www.dcalni.gov.uk/articles/work-ministerial-advisory-group-architecture-and-built-environment#toc-2>

Appendix - Materiality palette

Q7(a) Do you agree with our recommendations for the material palette as set out in Appendix 01? (please tick the box that most closely matches your answer)

Not at all



Q7(b) Have you any comment or suggestion for changes?



Yes

If yes, please state your comment or suggestion for changes

The information is too detailed, assuming that a physical design solution is the right solution without testing or considering other options. These could include temporary or permanent stewardship and management changes in the area that would prove whether or not physical change is actually needed and if so, what form it should take, based on evidence provided by people involved in the continuing stewardship.

The report does not deal with the visual clutter, including signage, that is apparent in the Conservation Area, much of which could be removed by a change in behaviour. The streets are mainly small, short streets with many junctions where it is possible to move through the area slowly (under 20 mph) but without taking very many minutes to do so. There is no need or inclination to speed (except to get through the lights before the next red traffic signal).

Initial work could be implemented by temporarily turning off traffic signals and indicating priority instead as part of a pilot study in collaboration with Transport NI and the Police Service for Northern Ireland, using the Community Planning techniques available to and led by the Council.

Appendix - Building quality

Q7(c) Do you agree with our recommendations for the building quality as set out in Appendix 02? (Please tick the box that most closely matches your answer)

Not at all



Q7(d) Have you any comment or suggestion for changes?

Yes

If yes, please state your comment or suggestion for changes

The building quality is already with us and will change very slowly over the years. In normal development programming, some 85% of 2050's buildings are already built. The recommendations to improve building quality could reinforce and support the existing briefing review and design review services which have been provided and refined by the Ministerial Advisory Group for the past eight years. A city design review panel would duplicate the existing provision and require expenditure on additional staffing to support it.

In respect of active ground floor uses, the report could go to the heart of the matter which is that for reasons of security and privacy, government and local government who are large occupiers of property in the study area are reluctant to have ground floors beyond their control. Their policies require "basement to roof" occupancy. Governments are not likely to open their premises beyond normal flexitime hours of around 8.00am to 6.00pm, Monday to Friday, leaving blank and unoccupied ground floors during evenings, weekends and public holidays. Creative reorganisation of government buildings, based on placemaking, could provide ground floor space to arts groups, performers and other passionate communities of interest who wish to animate the ground floor space. Government could devise management agreements that give such communities the keys to the ground floor. This has been proven in a council building in one town in Northern Ireland where duplicate keys are held by an arts group who use the building during evenings for painting and exhibitions of work. These are genuine software changes based on evidence that they actually work in our jurisdiction, and are not aspirations.

Other comments

Do you have any other comments that you would like to make?

The document was produced with reference to the city centre regeneration and investment strategy. However the report is exclusively based on physical solutions and appears not to accept the strategy's acknowledgement that the physical changes of Streets Ahead have not helped to produce a better overall city centre experience. The strategy states

“the high-quality streetscape improvements implemented as part of the Streets Ahead initiative create a general impression of a well cared-for district. However, Donegall Place and Royal Avenue have suffered from a decline in footfall and retail quality in recent years.”

People do not go to places because they are well paved and planted – especially if little or no recurrent funding has been allocated or achieved for activities and uses.

Belfast is known as a city of festivals, yet the report makes no mention of this asset, preferring instead to focus on physical changes which are proposed without any evidence of local testing in the social, political and economic environment within which the city operates.

Proposing investment in more hardware (what we build) without researching the need for investment in associated and compatible software (how we use places) could be informed by the experience described by the Council in its city centre regeneration and investment strategy in respect of Donegall Place and Royal Avenue.

Whilst the document advances the appreciation of the area beyond the Conservation Area guidance by aspiring to active ground floor uses, the report could give guidance on how to achieve this aspiration. The normal requirement of official buildings is to not include commercial or otherwise animated ground floors. If the aspiration for lively ground floors is to be achieved, the report could include creative and realistic proposals to animate ground floors of buildings occupied by central and local government offices. This response gives one regional example and others may be available.

The report could include research on whether the study area presently benefits from Belfast festivals and the passionate communities of interest who organise them. It could also indicate how benefit from festivals could be part of the future of the study area.

Belfast's current festival programme for 2016 is impressive and to acknowledge this in the report together with its current and potential opportunity to improve the study area would be a very worthwhile inclusion.

Arthur Acheson

Chair of MAG

7 | 3 | 2016

BELFAST FESTIVAL PROGRAMME 2016

8 - 31 January 2016 Out To Lunch Festival Cathedral Quarter Arts Festival
www.cqaf.com

08 February 2015 Chinese New Year Chinese Welfare Association www.cwa-ni.org

18 - 28 February NI Science Festival NI Science Festival www.nisciencefestival.com

19-21 February BMS International Festival of Chamber Music Belfast Music Society
www.belfastmusicsociety.org

February Belfast CityDance 2016 Crescent Arts Centre www.crescentarts.org

2 - 6 March Belfast Nashville Songwriters Festival Belfast Nashville Songwriters
www.belfastnashville.com

14-20 March Imagine! Belfast Festival of Ideas & Politics Belfast International Comedy Festival www.bellylaughsbelfast.com

17 March 2015 St Patrick's Day Belfast City Council www.belfastcity.gov.uk/stpatricks

March Feile an Earraigh Feile an Phobail www.feilebelfast.com

March An Droichead Spring Festival An Droichead www.androichead.com

8 - 12 March Brilliant Corners - Belfast Jazz Festival Moving on Music
www.movingonmusic.com

4-9 March Belfast Children's Festival Young at Art www.youngatart.co.uk

March Belfast International Festival of Performance Art Bbeyond

March Ulster Festival of Art & Design University of Ulster www.ulsterfestival.com

April Feile na Mona Glor na Mona www.glornamona.com April Belfast Film Festival
Belfast Film Festival www.belfastfilmfestival.org

April Sonorities Festival of Contemporary Music Queens University Belfast
www.qub.ac.uk/sonorities

28 April - 8 May Cathedral Quarter Arts Festival Cathedral Quarter Arts Festival
www.cqaf.com

May Festival of Fools Festival of Fools www.foolsfestival.com

9 - 13 May Writers on Writers Festival Linen Hall Library www.linenhall.com

May Tether East Belfast Arts Festival www.seedheadarts.com/tether

June Belfast Carnival Village Beat Carnival www.beatcarnival.com

June Belfast Photo Festival Belfast Photo Festival www.belfastphotofestival.com

June Belfast International Tango Festival Belfast Argentine Tango Society
www.belfasttangofestival.co.uk

24 - 26 June Belfast City Blues Festival Belfast City Blues www.belfastcityblues.com/

June Belfast Book Festival Crescent Arts Centre www.belfastbookfestival.com

June - July Forthspring Summer Festival Forthspring Community Association

July Belfast Guitar Festival www.facebook.com/belfastguitarfest

July Orangefest Orangefest

July Sandy Row Festival Sandy Row Residents

July Tullycarnett Intergenerational Fun Fest TAGIT (Tullycarnett Action Group Initiative Trust).

July Open House Belfast festival of contemporary architecture and design PLACE
www.place.org

July - August Belfast Pride Belfast Pride www.belfastpride.com/

July - August McCracken Summer Festival Cumman Cultúrtha Mhic Reachtain
www.mhicreachtain.com

July - August Feile an Phobail Féile an Phobail www.feilebelfast.com

August August Craft Month Craft NI www.craftni.org

August Colin Summer Festival Colin Neighbourhood Partnership

August Belfast Hills Heritage Festival Belfast Hills Partnership www.belfasthills.org

August Ardoyne Fleadh Cheoil Ardoyne Fleadh Project

August Lower Ormeau Intercultural Festival LORAG

August New Lodge Summer Festival New Lodge Arts

August EastSide Arts Festival East Belfast Partnership Board www.eastsidearts.net

August One Love Festival - Caribbean Week African and Caribbean Society of NI
www.acsoni.org August Woodstock Rhythm & Blues East Belfast Partnership Board
www.woodstockbelfast.co.uk August EastSide Arts Festival East Belfast Partnership
Board www.eastsidearts.net

August Feile An Droichead An Droichead www.androichead.com

August Lughnasa International Friel Festival Belfast Here I Come!

Lughnasa International Friel Festival www.lughnasainternationalfrielfestival.com

August Belfast MELA ArtsEkta www.artsekta.org.uk

August Household Festival Household Collective www.householdbelfast.co.uk

September Bounce! Arts Festival Arts and Disability Forum www.adf.ie

September The Community Festival at Skainos East Belfast Mission www.skainos.org

September International Youth Dance Festival Belfast Dance 16
www.dudanceni.com

September Hit the North '15 Community Arts Partnership www.comartspartner.org

16 September 2015 Culture Night Cathedral Quarter Trust
www.culturenightbelfast.com

September Belly Laughs Belfast Comedy Festival Belfast International Comedy
Festival www.bellylaughsbelfast.com

September Northern Ireland Coffee Festival NI Coffee Festival
www.nicoffeefestival.com

Sept - October Belfast Comedy Festival Belly Laughs
www.belfastcomedyfestival.com

September Beat "Made in Belfast" Carnival Beat Carnival www.beatcarnival.com

October Square Pit Belfast Contained

October - November Cinemagic Festival Cinemagic International Festival of Film &

TV www.cinemagic.org.uk

October Diwali & Nine Nights ArtsEkta www.artsekta.org.uk

October North Belfast Lantern Parade New Lodge Arts www.newlodgearts.com

October Made Festival The MAC www.themaclive.com

October Feile na Carraige Glor na Mona www.glornamona.com

October Belfast Fashion Week www.belfastfashionweek.com

October Imagine Arts Festival for Older People Belfast City Council
www.waterfront.co.uk November Belfast Design Week The Design Salon
www.belfastdesignweek.com

November Sounds of Belfast Oh Yeah Music Centre www.ohyeahbelfast.com

November Outburst Festival OUTBURST Queer Arts Festival www.outburstarts.com

November C.S. Lewis Festival East Belfast Partnership Board www.eastsidearts.net

November Festival of Brass Brass Band League www.brassbandleague.org

November Fleadh Feirste - the Gaeltacht Quarter festival Culturlann McAdam O
Fiaich www.culturlann.ie

December NI Human Rights Festival Human Rights Consortium
www.humanrightsfestivalni.com

December Wandsworth festival Wandsworth Community Association

December North Belfast Winter Fest New Lodge Arts www.newlodgearts.com