

Brucevale Residents Response to the Draft Equality Impact Assessment for Crumlin Road Gaol/Girdwood Barracks

Brucevale Park is situated along the northern border of Girdwood Barracks and runs onto Cliftonpark Avenue. We thank you for providing us with this opportunity to participate in this consultation process. However, we should point out that a number of residents who participated in previous consultations now feel disappointed that their views were totally ignored during those consultations.

We hope that this consultation will not do the same and ignore the views of local residents who live beside these sites.

We support the idea of promoting equality of opportunity in housing. The draft Equality Impact Assessment illustrates the extent of housing inequality in North Belfast and how this inequality will widen in the next three years (p40).

The draft EQIA in the section on housing makes explicit reference to the following Section 75 groups – i) political opinion, ii) race, iii) age, iv) marital status, v) sexual orientation, vi) men and women generally, vii) persons with a disability and persons without.

The assessment has included, for some reason, persons of different religious belief within the political opinion section. However, the EQIA does not clarify how the inequalities in housing will be addressed for the Section 75 groups between political opinion and persons of different religious belief.

The final EQIA needs to provide details of how housing inequality will be reduced and how equality of opportunity will be promoted between persons of different religious belief and political opinion. We believe that this should include a breakdown for the construction of a targeted number of 2, 3, 4 bedroom homes for small and large families. These homes need to be provided as social housing units as the provision of private housing will not reduce these inequalities and as the EQIA already demonstrates in detail, existing inequality in housing will increase in the next 3 years (38-39pp).

The other groups excluded from the analysis are persons with dependants and persons without. Paragraph 6.68 makes the following point: “Data is unavailable for North Belfast to show the number of persons with dependants and persons without. However data is available for the percentage of lone parents with dependant children in North Belfast. This is 13.3% whereas for Belfast it is 11% and Northern Ireland as a whole 8.1%.”

As well as this data, additional information is available for persons with dependants and persons without from the NIHE and some of this data is contained in the draft EQIA (38-39pp). This shows the level of need for large and small families. However, the Northern Ireland Housing Executive will have the detailed numbers of persons in these families beyond the actual applicant.

The EQIA asserts that: “The Department considers that people with dependants and those without will not be adversely impacted by a mixed use development as it is proposed that residential accommodation (including affordable housing) will be available to all on an equal basis”.

However, the draft EQIA shows the existing inequalities in housing and how there will be an increase in housing inequality within the next three years. However, it fails to show how the rising inequality in housing is to be addressed in any practical way.

The final EQIA needs to provide details of how housing inequality will be reduced and how equality of opportunity will be promoted between persons with dependants and persons without. We believe that this should include a breakdown for the construction of a targeted number of 2, 3, 4 bedroom homes for small and large families. These homes need to be provided as social housing units as the provision of private housing will not reduce these inequalities and as the EQIA already demonstrates in detail, existing inequality in housing will increase (38-39pp).

The EQIA makes references to the need for shared living accommodation for elderly persons. There will also be a need to provide bungalows for this Section 75 group.

The EQIA also makes reference to the focus group involving young people under 16 and makes the point: "A cross-community focus group of young people (under 16) expressed the view that residential accommodation was important and that apartments would be preferable to houses. Others felt that the site should be used to provide leisure facilities or theme park type attraction".

This is an important viewpoint. However, it is highly aspirational. The smallest social housing units are now two bed room apartments and under-16s are unlikely to have enough points to secure this type of accommodation. It is more likely, given the housing allocation system, that families would end up in such accommodation.

We are generally of the view that the provision of apartments on the site would tend to increase housing inequality amongst the Section 75 group persons with dependants and persons without if this reduced the number of suitable 2, 3 and 4 bedroom houses built.

The EQIA states: "Focus groups made comments on the provision of housing generally and that high rise flats were unsuitable for families and the elderly. The draft Masterplan however proposes some accommodation of 4-7 floors and not high rise buildings.

We think this is total semantics. The Divis flats complex in West Belfast was 8 storeys high (apart from Divis Tower which was 20 floors high). These were not considered suitable for families, were eventually demolished and replaced by traditional-style housing. Four-to-seven floor flats are no more suitable today in North Belfast than they were in Divis when this complex was demolished. It is interesting that the main proponents of high rise flats and high density living generally reside in low density and low level accommodation.

The EQIA lays some importance to this point and it is the second key point it makes on housing. However, it fails to consider whether the provision of 4-7 storey flats could have a negative impact on any of the Section 75 groups, nor does it consider how housing inequality will be addressed.

The draft Equality Impact Assessment fails to explain how housing inequality in North Belfast will be tackled and this needs to be completed before the next stage of the regeneration process begins.