

## **Appendix 2: Draft Belfast City Council response.**

Belfast City Council welcomes the opportunity to respond to the draft Equality Impact Assessment (EQIA) on the regeneration of Crumlin Road Gaol and Girdwood Park.

Council wishes to acknowledge the valuable work of Central Government over several years in providing support and working with communities in north Belfast to develop mutually beneficial partnerships and to provide improved opportunities across a range of social, economic, educational and employability initiatives. Such interventions provide a solid platform for ongoing engagement, dialogue and the realisation of the potential of the regeneration of the Crumlin Road Gaol/ Girdwood Park area to create further opportunities to the benefit, in particular, of local people.

Political representatives from all Parties have played an important role in the development of the proposals for the site thus far. It is clear from the deliberations of the Advisory Panel and the consultation exercise that followed the publication of the draft Masterplan for the site that no blueprint for “shared space” is yet at hand. The draft EQIA reinforces that view.

That said, however, Council continues to regard the regeneration of the site as a vital opportunity to create shared space, rooted in values of inclusion, diversity, equity and inter-dependence, and reaffirms its commitment to exercise civic leadership in working alongside central government, local communities and other stakeholders.

Council is convinced that the regeneration of the area can only be achieved if the importance of such values is recognised and is coupled to a long-term commitment to promote systematically greater civic understanding and debate at all levels, with all stakeholders and at the level of wider public opinion.

Council’s response is limited to salient issues arising from the EQIA, namely:

Areas of agreement; Equality and Good Relations; Housing; Leisure; and the Arc Road.

### **Areas of agreement**

Council welcomes evidence of cross community consensus on “many issues such as increased employment, tourism, health provision and the potential for improved educational facilities and accessibility to crèche facilities which were perceived to address community need.” (49: 7.3)

Council has extensive experience in employability initiatives (such as the Gasworks Employment Scheme), tourism, leisure and local economic development and remain fully committed to the development of the site to maximise benefits, particularly for local people. To that end, Council will continue to work in partnership with relevant stakeholders to effect such outcomes.

### **Equality and Good Relations**

Belfast City Council is fully committed to the principles and formal legal responsibilities of Equality of Opportunity and the promotion of Good Relations. In recognising both the importance of the regeneration of the area, not least to local communities, and Government’s obligation to adhere to the Section 75 of the Northern Ireland Act (1998), it should be emphasised that equality of opportunity and the promotion of good relations should not be reduced to a technical determination. This is particularly important in the context of the sensitivities and divergent views that pertain in this process.

The EQIA states,

“During consultations regarding the draft Masterplan concerns were raised by the Protestant community that if new housing is dominated by one section of the community, this would undermine prospects of the site becoming a shared space where communities could work, live and socialise together. The Advisory Panel were not able to reach agreement on the issue of housing.

That said, this cannot distract from the primary duty to the promotion of equality of opportunity. The Equality Commission states that, 'to the extent that public authorities perceive, in particular circumstances, a tension between the two duties, the primary duty of a public authority is its equality duty. The good relation duty cannot be invoked to justify a failure or refusal to comply with the equality duty'"

(EQIA 50: para 7.10 and 7.11)

Despite the assurances that follow (para 7.12) in regard to the need to promote good relations, in this particular instance, given the history of the process and the area, the above is open to the interpretation of the Department applying a technical means to come to a determination that inevitably will be perceived as "win : lose" by certain stakeholders.

This should be a case of "win : win": equality of opportunity *and* promotion of good relations; rather than equality of opportunity *or* the promotion of good relations. To achieve the former outcome, Government must be committed to an ongoing, long term and systematic process of engagement and dialogue with local political representatives and civic society to enhance civic understanding and come to an agreed political decision, however challenging that process may represent.

Clearly, cross-party political representation on any implementation body, consisting of a range of stakeholders including the local community to develop the site, as proposed, would be regarded as an important means towards ensuring that both equality of opportunity and the promotion of good relations would be achieved.

### **Areas of contention**

Members consider the three substantive themes (housing, leisure and the Arc Road), under which the Department considered an adverse or differential impact possible, as illustrating the fundamental weakness of the EQIA process: namely, that it leaves unresolved the local dilemmas and political issues that give rise to contention at a local level.

## **Housing**

The EQIA notes that housing type, location and allocation were recurring issues at both the consultation meetings and focus groups. At an earlier stage of the masterplan consultation process, it was not possible for Council to reach an agreed position on the specific aspects of housing (BCC Response to draft Crumlin Road Masterplan).

It is clear however that Crumlin Road/ Girdwood Park cannot offer, in itself, a panacea for the challenges of unmet housing need in north Belfast. Council therefore welcomes Government's commitment to ongoing dialogue in relation to the final determination of housing type, location and allocation.

## **Leisure**

In regard to Leisure, BCC leisure centres are available for use by all sections of the Community and are compliant with Disability Discrimination Act legislation. Any new leisure facilities, which may be developed by Belfast City Council, will be consistent with this approach.

## **Arc Road**

Council had previously recognised the Arc Road 'as a strong structuring element but it seems that its purpose is dominated by vehicular use within the site'. Council questioned if it would be well integrated into the community and will it be used as a street or will it look more like an entrance to a business park? It was suggested that access by other routes should be feasible – the proposed Arc Road should not be considered the only option' (BCC Response to draft Crumlin Road Masterplan).

In the context of Council's earlier submission, the Department's preparedness to consider relevant measures, cited below, is to be encouraged.

- Reconsider the draft masterplan proposals in relation to the roads and traffic flows and firm up on the detailed design to ensure traffic management measures will be put in place to ensure access for all communities; and

- Improved public transport into and throughout the site (also providing social economy opportunities) as well as environmentally friendly and sustainable transportation routes.

### **Concluding remarks**

Belfast City Council welcomes the publication of the draft EQIA on the Crumlin Road Gaol and Girdwood Park Draft Masterplan. The systematic analysis has identified several categories which may potentially be affected by an adverse or differential impact. The consideration of appropriate mitigating measures or alternative policies is thus also welcomed.

The mission statement within the draft Masterplan is both bold and appropriate:

“To create a regeneration project of international significance which brings maximum economic, social and environmental benefits to the local and wider community and in so doing creates a vibrant, inclusive and diverse environment which attracts present and future generations of people to live, work and visit”

Beyond the technical analysis, a process that will require political acumen, underpinned by processes of community engagement and consensus-building is both necessary and desirable if the vision is to be realised. Belfast City Council is committed to playing its part in those processes to ensure the realisation of a transformational vision for this part of the city.