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North Belfast Community Action Unit
Crumlin Road Gaol/Girdwood Park Project Team
55-59 Adelaide Street
Belfast
BT2 8FE

14th January 2009

Dear Sir/Madam

RE: Draft Equality Impact Assessment

Thank you for your letter, enclosures and your request to consult with the Community Relations Council (CRC), on the Draft Equality Impact assess on the proposals for the redevelopment of the Crumlin Road Gaol/Girdwood Park site. CRC welcomes the opportunity to comment, recognizing, as we do, the central role this opportunity plays in achieving equality and promoting good relations in all aspects of public policy.

Council views this site as an iconic opportunity, not only for the immediate wards surrounding the area, but as a place that can and should bring positive change for the city, and for the region. Many aspects have to be considered, but ultimately it is a space should be used by the community, both locally and further afield.

Process

CRC welcomes the publication of the draft Equality Impact Assessment (EQIA). Central to our submission is a wish to see not only that equality and good relations are met in letter, but that the spirit of equality and good relations is central to everything connected to this project. It is hard to overstate the opportunity which the development of this site offers to change and renew North Belfast. Central to success is a determination that this is about something truly new, not merely a reproduction of what already exists or a political carve up which leave North Belfast where it already is- only more so: divide, neglected and poor.

As per the Equality Commission Northern Ireland (ECNI) Guidance for Implementing Section 75 of the NI Act 1998, mainstreaming requires that equality is central to the whole range of public policy decision making process - from the initial planning and development stages through to the implementation, monitoring and review of the development (in this instance the regeneration of Crumlin Road Gaol/Girdwood Park site. We believe that this requirement should be part of every stage of the development process.

CRC asks for confirmation that the draft EQIA process will be mainstreamed into the ongoing masterplan development. It is our main aim to influence and develop policies and actions that can tackle the existing serious inequalities in North Belfast, whilst also promoting good relations. Council anticipates that Department of Social Development (DSD) will take our comments into account, which are offered as a constructive way forward.

Data

Council welcomes the significant amount of data gathered for this draft EQIA which highlights to socio-economic profile of the area. It reaffirms the need for this regeneration project to have at its core, proactive measures that will make a positive change, to the lives of those living in the area and tackle inequalities.

During the development phase of the masterplan, the panel were aware of inter-community tensions and concerns that were raised about particular proposals e.g. territoriality of space and housing. CRC therefore feels it would be very useful if the draft EQIA also examined supplementary data which highlights the segregated nature of the area and the impact this may have on current and future proposals. It is essential that plans, targets and indicators are developed within the daily reality of interface life. The draft EQIA should consider relationships at interfaces, barriers to employment and trauma relating to the conflict.¹ Furthermore, social attitudes are an important feature that should be taken into account². A recent interface survey carried out by US-Ireland Alliance asked Belfast residents if peace lines should come down. 60% said yes but only when it was safe enough, and they didn't feel the time was right at the moment.³ All of these sources are relevant to the segregated geography of North Belfast and the wards surrounding the Gaol site, and more importantly will have to be factored into all of the final proposals – in a sense 'interface proofing' i.e. changing the patterns of the past.

Legacy of the Past

Disadvantage and inequalities must be central to everything which stems from the draft masterplan, as must consistent and tangible actions and targets to build, support and promote good relations. North Belfast is one of the most deprived areas in Northern Ireland⁴. The legacy of the conflict must be tackled alongside the challenges of unemployment, poverty, qualification attainments, and poor health. Tackling disadvantage and mainstreaming good relations belong together. Improving access to employment, education, housing and tackling health inequalities are crucial as is the need to contribute to reconciliation.

According to Northern Ireland Statistics and Research Agency (NISRA) 17 of the top twenty most deprived areas in Northern Ireland are located in North or West Belfast. It is clear that some of the most deprived parts of Northern Ireland are also the most segregated, and contain the greatest number of peace walls. It should be noted that North and West Belfast alone accounted for 1240 (or over one third) of the 3636 fatalities in total that took place over the course of the conflict⁵. Such statistics provide direct evidence of the disproportionate impact of the conflict on the poorest sections of our society.

Economy

¹ Belfast, Segregation, Violence and the City, Shirlow P, Murtagh B. 2006.

Segregated Lives: Social Division, Sectarianism and Everyday Life in Northern Ireland, Hamilton et al 2008.

² Northern Ireland Life & Times Survey. 2007

³ Press Release, US-Ireland Alliance, 5th February 2008.

⁴ Northern Ireland Multiple Deprivation Measure 2005

⁵ CAJ Submission to Eames/Bradley, Legacy of the Past.

*'Its worth noting for example that figures from OFM/DFM revealed that over the period from 1997 to 2004, the proportion of workless Protestant households increased from 14% to 16%, while there was a very slight drop in relation to the equivalent figures for the Catholic community (20% to 19%). Significantly, this occurred during a period of general economic growth, indicating that those in greatest need, do not automatically benefit from economic growth in general – i.e. a rising tide does not lift all boats. **Indeed, experience to date in Northern Ireland has been that economic growth has tended to benefit least, those who are worse off.**'⁶*

Crumlin Road/Girdwood represents an opportunity to change the face of North Belfast. The site must be developed in such a way that it connects the economy of one of the poorest areas of Northern Ireland with the wider city and regional economy- for example by providing resources of regional significance and providing a deliberate and managed shared space in an area of endemic conflict. At the same time it must not be a 'glass palace' which has no effect on people living locally except to displace them through rising property values.

In tackling the economic development of the site, CRC therefore urges DSD to develop specific measures that will tackle local economic inactivity, particularly long term-unemployment. Council is aware the masterplan proposes apprenticeships and training facilities. The EQIA needs to provide more detail as to how this will be developed and delivered on the ground, how it will be targeted and any resource implications. The following should be considered:

- Specific measures and targets put in place at contract and procurement stage. Procurement guidelines should stipulate good relations targets i.e. location of training must be accessible to all parts of the community, barriers to mobility explored and actions taken to reduce these barriers.
- Skills development – Investment in skills should go alongside physical development. The target should be sustainable incomes from sustainable jobs.
- Barriers to employment A 2006 report examined barriers to employment among disadvantaged young people stated 'For roughly one-half of the young people interviewed the patchwork of tribalised areas interlaced with interfaces between opposing communities placed sharp boundaries around employment opportunities. They expressed a reluctance to enter a workplace perceived to be the domain of the religious outgroup: traveling through or into an area so perceived to get to work was regarded as an even greater threat. In addition to fear of attack, reasons given for not being prepared to take the risk of crossing interfaces for the sake of work included:
 - lack of identification with people from those communities
 - an up-bringing of suspicion and avoidance
 - family anxiety caused by them working there
 - insufficient remuneration.

⁶ NIPSA, Response to Programme for Government. 2008.

Others stated that their willingness to cross an interface to work in an area of the other side was conditional upon remaining anonymous, not being harassed and the job being on a short-term basis'.⁷

- Good relations must form part of these measures and targets. It is not enough to provide skills alone. People must be safe to live, work and play on the whole area. CRC believes government must be proactive and strategic when promoting good relations. We strongly advocate the mainstreaming of good relations into training and apprenticeship packages e.g. delivered cross-community. Thereby enabling contact with the other community which has the potential to reduce prejudice between individuals and the wider social group⁸
- According to Participation and the Practice of Rights Project (PPR) 'legal and policy requirements on equality and objective need must be mainstreamed throughout all plans for regeneration in North Belfast in order to avoid wasting both resources and opportunities'.⁹ Equality of safety and of feeling safe are as vital as equality of access to housing to the quality of life of all those engaged in this project and to the capacity of this project to fulfil its promise of change in an area of neglect and poverty. This will require an ongoing active inter-community management structure which takes both the issue of fair distribution and the issue of open access equally seriously and devises measures to ensure that all aspects of equality and good relations are met together.
- The current concentration of poverty in North Belfast must be altered not sustained. The promise of Crumlin Road/Girdwood is one of radical change not meeting immediate needs. Needs must not be met by reproducing the circumstances which produced the problems in the first time. A 'more of the same' approach will not change the patterns of the past.
- It is also important to consider gender issues such as childcare provision and pay differentials that exist between women and men i.e. women who work full time earn on average 11% less than their male equivalents. There is a general acknowledgement that the lack of childcare provision is a major barrier to women accessing other key services, education, employment, health.

Education

St. Malachy's. Crumlin Road/Girdwood offers an opportunity to ensure that a programme of action is devised to ensure inter/intra community use of the facilities. The proposals would benefit from an outreach objective (community and school usage). This could be developed with the school managing authority in partnership with interested groups and stakeholders. Terms of Reference, targets and monitoring measures should be formulated. This scheme offers an opportunity for DSD to reconsider territorial

⁷ Breaking Down Barriers: Sectarianism, Unemployment, and the Exclusion of Disadvantaged Young People from Northern Ireland Society, Hargie et al 2006.

⁸ Interpersonal Relations and Group processes; A Meta-Analytic Test of Intergroup Contact Theory;

⁹ Changing the Patterns of the Past, PPR, 2008.

boundaries in the localised area when developing this aspect of the proposal to ensure that access targets are not limited to single-identity groups, resulting in creating further divides in a community that is already highly segregated, and restrict usage of the facility.

Learning Hub. Clearly the local area is an area of poor educational attainment. The opportunity to turn Crumlin Road/Girdwood into a learning hub is therefore both exciting and challenging.

Statistics on the 'Poverty Website' relating to educational attainment re-affirm the need for a collaborative approach amongst a number of government departments:

- In Wards with high levels of deprivation, many more school leavers in Catholic wards continue to further or higher education, than school leavers in Protestant schools.. For example, amongst wards in the 5 most deprived wards, Catholic wards saw 55% of school leavers going on to further or higher education in the three years to 2006/07, compared with only 41% in Protestant wards. Amongst wards in the 2nd most deprived a 1/5 of all wards, Catholic wards saw 67% of school leavers going on to further or higher education, compared with 55% in Protestant wards.
- An area's level of deprivation makes less difference to the proportion going on to further or higher education if the area is Catholic than if it is Protestant¹⁰.

Learning represents an opportunity to promote a common interest for the whole city and for local communities as well as an opportunity to make a long-term contribution to reducing poverty and building good relations on the basis of high quality resources. We therefore strongly reaffirm the focus on learning in this proposal, but hope that this can be developed in a more detailed way. Any proposal must both tackle the urgent local issues of training and basic education while offering high-quality facilities which encourage movement across the whole city. Quality and connectivity are crucial contributors to good relations and a sustainable economy and help turn this interface into a new point of common endeavour.

Health

Poverty and conflict have had a serious and ongoing impact on the health of communities and individuals in North Belfast. A recent CRC report examined perspectives within the Victim/Survivor sector and it emerged there was a lack of recognition of the trans-generational impact of the conflict. The impact of loss and of traumatic events that have been experienced, witnessed and absorbed continue to have trans and inter-generational implications.

The existence of high quality health related facilities represents an important opportunity for this site. Similar to education, health offers an opportunity for high quality facilities to act as a vehicle for shared space and an opportunity for employment and connectivity.

Leisure

Presently the majority of Belfast City Council leisure facilities are located in one or the other community. This is a disastrous aspect of the impact of fear on movement in

¹⁰ <http://www.poverty.org.uk/i32/index.shtml?2>

Belfast. A recent report found that leisure facilities are 'similarly viewed as being divided on the basis of community background with some interviewees indicating a degree of fear in accessing certain areas to make use of the facilities'¹¹.

It is therefore vital that serious efforts are made to ensure that investments in leisure are genuinely open and available to all. This will require more than pious statements but will require active management. Shared space requires high quality facilities which attract people, open and safe design, thought to location and access and serious ongoing management. This is both a good relations imperative and an economic priority if leisure facilities are to be sustainable. Poor quality facilities supported by poor people from one community does not represent change or worthwhile investment.

It is insufficient to assume the facility will be used by all of the community. The Draft EQIA should consider ways in which policies can make the facility safe and accessible:

- Access to safe public transport, cycle pathways and walk ways
- Management as a shared site
- Staff training on good relations issues/conflict management
- Marketing and promotion of the facility
- Monitoring and evaluation processes that look at a broad range of issues i.e. who is using, when they are using etc. This method should help quickly identify issues around access/usage and enable intervention measures.

These are difficult issues but they must not be avoided or denied. Management of the whole site with a proactive remit to ensure safety, openness and equality will be required over and beyond direct management of the facility.

Engagement and Young People

A report that examines children and young people and public space recommends that 'all urban and rural regeneration strategies should embody within them clear public space strategies. In turn, these should spell out clearly and precisely how the needs and interests of children and young people for safe, accessible play and recreational use are to be incorporated, costed, managed and maintained.'¹² The report also emphasises that creating a sense of ownership of public and community space is a 'pre-condition of successful use, care and maintenance.'

Central to the success of Crumlin Road/Girdwood is the need to engage with young people, to ensure a leisure facility is what is needed. Of course a regional leisure centre of excellence would enhance the site and attract people from across NI. However consideration of local youth needs is also an integral part of success.

We seek clarification on how children and young people (CYP) were involved in the consultation process, both the masterplan and the draft EQIA. The mitigating measures states they will be involved in designing facilities and services, they must be involved at the development phase.

¹¹ Segregated Lives: Social Division, Sectarianism and Everyday Life in Northern Ireland, Hamilton et al 2008.

¹² No particular place to go; Ken Worpole, 2003.

Housing

A successful regeneration is a living regeneration. This scheme needs people who live in the area as well as those who work, use facilities and visit.

By far the most politically sensitive issue in relation to this site is the question of social and affordable housing. Meeting housing need must be a core priority of any serious government for this area. It is not, cannot be and should not be reduced to a dog-fight between needy communities over every available scrap of land in North Belfast. That way lies a road to endless sectarian strife between communities and people in need.

Meeting North Belfast's social housing need is therefore not a question of this site alone but must be addressed at a strategic level, within which the contribution which social housing at Crumlin Road/Girdwood can be realistically assessed. The absence of any strategic plan to address housing need has turned this site into a inter-community battleground, in which there is a severe risk that the triple requirements of meeting need fairly, building communities which are not divided into exclusive territories for one political identity or another and serious economic development are turned into oppositions rather than co-requirements.

This site must be developed to meet three clear objectives:

- To meet a reasonable proportion of social housing need, allocated on the basis of need alone
- To encourage the development of a new shared resource, which people of all incomes and backgrounds consider a safe place to live
- To connect the most neglected and deprived part of Belfast directly and permanently into the social and economic life of the whole city and wider region.

Equality in this case means:

- An agreed element of social and affordable housing which is available on an objective needs based and equality-proofed basis.
- Demonstrable equal access by all persons living on the site and those coming in to the site to all of the public spaces in the development, so that there are no implicit chill factors to any access. This will require active management
- Attractive, safe, openly accessible private housing which attracts people of all backgrounds, ages, family-type and incomes to live in one of the most dynamic areas of the city and so spreads the economy more equally within the city and region.

Good relations in this case means:

- Meeting all of the equality criteria over time, through agreed pro-active management and rules, thereby building confidence that good relations and equality are co-requisites not opposites.
- Inter-community and city-led management of the site to ensure a dynamic, open and fair development – the opposite of current expectations in North Belfast.

CRC believes that social and affordable housing should make up between 30-50% of the housing on this site. This should not be achieved by artificial social engineering, for example aiming all housing at the elderly, although some of the housing may be usefully designed for this use. On the basis of the statistics supplied in the EQIA, the overwhelming proportion of social housing appears likely to be allocated to people classified as nationalist. Whatever the case, need should determine outcome.

At the same time, the critical new task, a task which is vital for the future of this entire region, is to ensure that people may live freely on the site without being treated as interlopers and that people may enter and use the facilities of this site, and live safely and freely on the site without belonging to the numerically dominant resident group. Again, this will require deliberate, careful and agreed frameworks for management of the site in the early years.

This issue cannot be dodged, if North Belfast is to move from its current poverty and neglect to a dynamic and open future. CRC urges politicians to look to avoid knee-jerk responses and to focus on the huge prize which this site offers. We look forward to serious practical engagement on the question of how this site can meet its potential as a driver for change and improvement.

Public Realm & Development Sites

CRC urges DSD to examine this area again. It is important to note the data on sectarian motivated crime, flags and murals. These could potentially create barriers to public and private space. Measures need to be devised that will create and sustain open and safe spaces with agreed mechanisms for enforcement.

Management (development trust/implementation body)

The draft EQIA refers to an implementation body. This is a vital element in shared space and should be established over time with credible local input. A key lead body, possibly the City Council, might be engaged to co-ordinate this. CRC would also be willing to play a role in any management structure.

The implementation and management body should be

- Accountable to a clear development mandate, in relation to economy, equality and good relations
- Appointed openly to reflect local, city and wider interests and with clear expertise in development
- Report on progress on an annual basis against the economic, equality and good relations established in the mandate, including developing monitoring and evaluation measures.
- Committed to dialogue with the community and to developing pathways to ensure the integration of this site with the surrounding communities.

Community Dialogue

Finally, CRC would like further information on this mitigating proposal:

- When will this process begin
- Issues

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- Community development or community relations
- Short or long term approach.
- Indicators

The draft EQIA, provides a useful overview of the current level of inequalities in the relevant wards around Girdwood/Crumlin Rd; however CRC would like further information on specific proposals, priorities and exactly how they will impact across the Section 75 groups and good relations when the information is available.

There are a number of concerns and recommendations that CRC have highlighted in our response to this development. We look forward to receiving clarification on the points raised and discussing in more detail the recommendations set out.

Furthermore, it is important to examine this regeneration scheme in the context of the whole of Belfast City. There are numerous regeneration plans in progress, each at various stages of development and it is important they are considered collectively i.e. housing, employment, leisure, health, and reconciliation. How are they connecting the communities - are they offering opportunities for engagement and interaction in a safe environment. Are equality and good relations core objectives, and how are they being mainstreamed. This is an important discussion which CRC looks forward to continuing with DSD.

END