

Submitted to **Belfast LDP 2035: draft Plan Strategy Equality Impact Assessment**  
Submitted on 2018-11-15 16:51:50

## 1. Data Protection

1 To facilitate more open and transparent government, Belfast City Council would like your permission to publish your consultation response in the public domain. Should you prefer us to treat your submission as confidential - either by publishing it as an anonymous response or by not publishing it at all - please indicate accordingly.

Yes, please publish my response, but only include my organisation's name (for those responding on behalf of an organisation)

## 2. Your details

2 Are you responding as an individual or on behalf of a group or organisation?

Individual, Organisation or Agent:

Organisation

3 What is your name?

Title:

■

First Name:

■

Last Name:

■

4 What is your address?

Address Line 1:

24 Lombard St

Address Line 2:

Address Line 3:

City:

Belfast

Postcode:

BT1 1RD

5 What is your telephone number?

Telephone number:

■

6 What is your email address?

Email address:

■

## 3. Organisation

7 If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

Belfast Healthy Cities

Your Job Title:

■

Address Line 1:

22-24 Lombard Street

Line 2:

Line 3 :

City:

Belfast

Postcode:

BT1 1RD

## 5. Before you submit your comments

## 6. Equality Impact Assessment (EQIA)

### 10 To what extent do you agree with the key findings outlined in this draft EqIA report?

Neither agree nor disagree

**Please enter any comments here::**

The availability of suitable means of access to schools is important for improving levels of engagement between schools and their local communities, including school-age children and their parents / family members. Children's and elderly people's lives in particular are primarily local. Walking and cycling infrastructure and public transport routes that improve access to school facilities support opportunities for their independent mobility. A degree of independence is important for children's and elderly people's confidence and their healthy development.

Whilst we recognize that the design of the school curriculum is not determined by the planning service, we also find that the Plan Strategy does not seem to put a lot of focus on the safeguarding of equal quality of school facilities and the provision of suitable means of access to schools. It is our view that the EqIA overstates the positives effects that the Plan Strategy's active travel policies might have particularly since these policies mostly relate to development in major and strategic development sites and not necessarily to development on local community level.

### 11 To what extent do you agree or disagree that all potential impacts relevant to the Draft Plan Strategy have been adequately identified?

Disagree

**Is there additional evidence you suggest we consider?:**

The critical gap in this equality impact assessments is a lack of assessment of the impact of the Plan Strategy on the socio-economic status among the population. Socio-economic status is the single greatest determinant of health and wellbeing and life expectancy of populations (Review of social determinants and the health divide in the WHO European Region: final report, 2013, WHO Regional Office for Europe). Given the focus on inclusive economic growth in the Plan Strategy it would be essential to carry out an assessment to this effect.

When it comes to inclusive economic growth, the Belfast Agenda focusses on improved access to skilled employment for deprived communities through skills development and support for social economy. It is not clear how the Local Development Plan Strategy responds to this aim. The plan seems to rely on a 'trickle down' economic model, with most of the employment opportunities foreseen to be created in business sectors that require a high skill level, such as ICT and digital services.

Many parts of Belfast unfortunately remain untouched by recent economic growth' and there is much evidence that this is because wealth tends to be unequally distributed. Jobs need to be created across skill levels in a variety of sectors. Progression options and opportunities are important to motivate people to take up employment and develop new skills. Creating new jobs in the middle skill levels and sectors offers a way to do this, while also driving movement in the job market. It also helps avert the economic risks and widening inequalities associated with a job market divided between low skilled, low paid jobs at one end, and highly paid expert jobs at the other.

A persistent gap in educational achievement levels among children from deprived communities and children from affluent communities (Northern Ireland Peace Monitoring Report #4, Robin Wilson, CRC, 2016) can to a large extent be traced back to the fragmentation of the education system in Northern Ireland. This differentiation in educational context is particularly evident in the post-primary level. Children from a deprived background are much less likely to thrive in school due to a combination of factors, including quality of education, access to schools, quality of school facilities and higher drop-out rates.

In the Review of Social Determinants and the Health Divide in the WHO European Region (2013, WHO Regional Office for Europe), Michael Marmot noted the issue of youth unemployment is a public health crisis in the making. His comments recognise the long established evidence that worklessness impacts directly on health. He observes that while the most immediate consequences are an increased risk of depression and suicide, there are longer term increased occurrences of chronic conditions such as cancer, heart disease and stroke. He warns that action to tackle the issue needs to be taken now if we are to avoid an epidemic of these conditions amongst today's young unemployed as they age.

### 12 What suggestions would you like to make to address any of the issues raised in the draft EqIA or any of the concerns you may have?

**Please enter your comments here::**

In order to develop Belfast as a more equitable city, the development of adequate physical access routes to major and strategic employment sites, such as the city centre, and higher and further education institutions should be prioritised. Good quality and accessible public transport links alongside active travel networks are essential to support a population that is economically more resilient, in particular by supporting the skilling up of younger and older people. WHO Europe believes that 'resilient communities respond proactively to new or adverse situations, prepare for economic change and deal better with crisis and hardship' (Health 2020: A European policy framework supporting action across government and society for health and well-being, 2013, WHO Regional Office for Europe).

New approaches to education and training are needed to engage people. Belfast has a strong third level education sector, but in many parts of the city young people do not progress to this level. SDG 1 - End poverty in all its forms everywhere highlights that social and practical support is essential to enable people and

families to take up work in a sustainable way that reduces poverty and inequality. For adults, practical support such as childcare and transport increase their ability to participate in training and sustain employment. People living in poverty often have limited physical and digital access to employment opportunities. Access to appropriate support and care is therefore an element of enabling employment, and is particularly important to enable people with disabilities, mental health issues and long term conditions to find sustainable and meaningful jobs.

**13 Do you have any other comments you would like to make on the draft EqIA report?**

**Please enter your comments here::**

A health equity assessment tool was developed by BHC and key partners, including Belfast City Council, to assess policies and plans against health equity and to ensure that policies and plans do not further widen the gap in life expectancy but decrease that gap. Whilst it is appreciated this is not a legislative tool, this is a tool that will help the Planning service identify negative impact on low income communities.