

# Consultation Report into the Proposed Changes to the Dual Language Street Signs Policy

April 2022

## **1. Executive Summary**

Belfast City Council agreed on 7<sup>th</sup> January 2021, to carry out a public consultation accompanied by an Equality Impact Assessment into proposed changes to the Dual Language Street Signs Policy. The proposed changes to the policy include:

- amending the process for starting an application
- lowering the required threshold for support
- clarifying how responses to the street survey are classified
- conducting an equality assessment on each application; and,
- explaining the operation of the council's residual discretion.

This report presents:

- the rationale and background of the council decision,
- the process for developing and launching the consultation
- the consultation response to the policy proposals
- the recurring themes evidenced in the consultation.

The ultimate aim of this is to give elected members as clear a picture as possible of the stakeholder and the public response and issues raised in relation to this policy proposal. This will allow elected members to make an informed decision based on this evidence. This report is accompanied by an independently written Equality Impact Assessment report which will give more specific detail and recommendations in relation to the proposed policy changes.

It should be noted at the outset of this report that this policy proposal generated considerable opinions both for and against and extensive discussion in the media and on social media. The final decision is likely to generate debate both within the council and in the media.

## **2. Background**

Belfast City Council has had a policy permitting the erection of dual language street signs in residential streets since 1998. This is a discretionary power granted to the council pursuant to the Local Government (Miscellaneous Provisions) (Northern Ireland) Order 1995 which allows for a local council to erect a dual language name plate in a language other than English. Article 11(4) of the 1995 Order requires councils to have regard to any views on the matter expressed by the occupiers of premises in the street in question. The introduction of this policy in Belfast City Council effectively allowed for dual language signs to be erected in a street where residents could demonstrate the required amount of support for this. While the Local Government Order applies to all languages, there are no dual language signs in Belfast in any language other than Irish. The Irish language street signs are concentrated most densely in west Belfast with the north, east and south of the city having signs but not in comparable numbers.

### **2.1 The current policy**

The current Belfast City Council policy in respect of erecting a bilingual sign is outlined as follows:

- A resident in the street in question must collect the signatures of 1/3 of residents in the street saying they are in favour of the erection of a dual language name plate and present this to the council
- BCC Building Control section carries out a postal survey of the residents of the street on the electoral register
- A threshold of two thirds of residents on the electoral register in the street have to be in favour of the erection of the sign, with non-responses being counted as a “no” vote
- If the required threshold is reached, the results of the survey are then sent to the Council’s People and Communities Committee who approve the application and the dual language name plate is erected by an external contractor.

The current process takes roughly six months from initial petition to the sign being erected. It should be noted that the translation of the street name is carried out by

The Northern Ireland Place Names Project at Queen's University, Belfast. This is carried out by the project in addition to their own work and entails an element of in-depth research to produce an accurate street name. Having this carried out by qualified researchers with expert knowledge in this field lends an element of quality assurance to this process which council officers alone could not provide.

## **2.2 The proposed change to the Council's Dual Language Street Signage Policy**

Belfast City Council, following much debate, agreed in January 2021 to revise the Dual Language Street Signs policy subject to a full public consultation and an Equality Impact Assessment.

Members reached a decision, ratified in January 2021, to adopt a new policy position. This decision was subject to a 'call in' on procedural grounds and on the grounds that the proposed policy might have a detrimental effect on the Protestant or Unionist communities. These assertions were found to be without merit in a legal opinion provided by a practicing barrister. An officer working group then developed the proposed policy, which is outlined below:

- The process can be started by an occupier or occupiers of the street in question, an elected member for that area or a developer building a new development – removing the need for an initial petition;
- Councillors will be presented with a list of applications before these proceed to the survey stage. This allows for elected members to flag any potentially contentious applications early on in the process;
- The council will conduct a survey of the residents in the street in question, with 15% of returned responses in favour being deemed a sufficient threshold for further consideration of the application;
- Non-returned forms are not counted as either a "yes" or a "no", but elected members will be given a breakdown of those for, against and those who did not respond;
- The council will retain a "residual discretion" in relation to each application, this in effect gives elected members the option to depart from the policy. It should be noted that the council always had residual discretion in these matters to depart from this policy.

- Each application will be subjected to an equality and good relations assessment to determine what impact the potential erection of a dual language sign might have in a given area. This can, if required, trigger a formal equality screening and possibly an Equality Impact Assessment;
- The council's current resources enable it to process a maximum of 5 applications a month.

### **Residual discretion**

The proposed changes to the policy include a new section that describes what factors are to be considered when the council exercises residual discretion, namely:

- the views of the occupiers of the street;
- the results of the assessment of each application to identify and inform the council of any equality of opportunity, good relations or rural needs implications;
- consideration of the local context of the application;
- any other council policies or strategies related to the application; and
- all material considerations relating to the application.

This means that the council can take into account the specific circumstances of each application when determining the outcome and that, according to a report to Belfast City Council's Strategic Policy and Resources Committee in April 2021, "The exercise of the Committee's residual discretion will ensure that second language street signs will not be erected in a manner which could undermine Good Relations at a neighbourhood level."

Council staff sought legal advice concerning the parameters for the residual discretion referred to in the policy. The barrister advised that residual discretion could not be the subject of any rigid parameters and that elected members should consider each application on an individual basis and discuss whether the policy needed to be departed from in any way.

### **3. Consultation Design Process and methodology**

#### **3.1 Officer working group**

An officer working group was established in January 2021 to develop a draft policy and to determine procedural issues in relation to the implementation process. This group was chaired by the council's Governance and Compliance Manager and was attended by representatives of the Council's Building Control Unit (the owners of this policy), Governance and Compliance section and the Good Relations Unit, the Equality and Diversity Unit, the council's Irish language officer, Legal Services and the council's Strategy, Policy and Partnerships section. The working group also received advice from a practicing barrister on legal issues potentially relating to the proposed policy and its implementation and from external consultants who specialise in equality issues.

This group drafted the text of the proposed policy reflecting the decision reached by elected members including the reduced threshold and the removal of the need for an initial petition to be collected. The working group also discussed, at length, possible procedural issues in relation to the implementation of the proposed policy and the potential resource implications surrounding this.

Advice from a practicing barrister and external consultants focused on the potential good relations impacts of this policy and how this might be mitigated. Legal advice stated that an equality assessment should be carried out in relation to each application. This assessment would gather local demographic information and statistics to support the decision-making process and to give the People and Communities Committee as much information as possible in relation to each application. It should be noted that this exercise is not a full Section 75 Equality Screening.

The proposed policy was subject to a Section 75 Screening and this was screened in for a full Equality Impact Assessment to be carried out by an external consultant. The Equality Impact Assessment accompanies this report.

### **3.2 Methodology**

The public consultation into this proposed policy change was launched on the 22nd November 2021 and concluded on 28 February 2022. The survey was available in both English and Irish Languages. A hard copy format of the survey, in both languages was also made available upon request.

### **3.3 Public information sessions**

Council officers, in conjunction with an external events company, arranged for 4 online public information sessions to present the policy to the public and allow them to give feedback. Online events were organised due to the ongoing spread of COVID at the time and to avoid situations where large groups of people were brought together.

These public information sessions were chaired by the council's Governance and Compliance manager and a presentation was given detailing the proposed changes to the policy and asking for feedback through the online consultation. The public sessions were poorly attended with 4 people attending across the four sessions, despite a total of 15 people registering for these events in advance. The public information sessions were highlighted on the council's website and on social media with participants being encouraged to register their desire to attend in advance.

### **Engagement sessions with stakeholders and political parties in relation to the development of this policy**

Council officers and the external consultant appointed to work on this consultation carried out a number of engagement sessions with relevant stakeholders from the Irish language and Ulster-Scots sectors, as well as the political parties in Belfast City Council. These engagement sessions elicited a range of opinions both for and against the proposed changes to this policy.

### **Democratic Unionist Party**

DUP councillors voiced the opinion that there was no need to change the policy as the current policy worked. There was a discussion of their fear that the proposed changes could have a negative impact on good relations, especially in mixed areas and that this could have the effect of "branding" areas. The DUP said they were, as a

party, uncomfortable with the proposed change which would allow a single elected member to request that a sign be erected in a street or that a developer be allowed to begin the process. Members also challenged the grounding of this policy in guidance from the UN Special Rapporteur. The opinion was expressed that the 5%-20% threshold for the use of a language, other than the primary language, in signage, referred to scenarios where the 5-20% of the population have no knowledge of the primary language. DUP members expressed the opinion that that wasn't relevant in this case as people who speak Irish also speak English.

There was also a discussion of residual discretion and how this could be used to prevent or approve the erection of a sign depending on circumstances and discussion around these issues in committee. It was noted at this point that each application will come before committee and will ultimately be subject to a political vote.

### **Ulster Unionist Party**

Ulster Unionist Party members said that they were opposed, as a party, to elected members being able to begin the process to have a sign erected. They felt that this would cause particular difficulties in DEAs where representatives of multiple parties are present. The UUP also voiced concern that were signs erected in areas where there was opposition to this that this would result in vandalism and damage to community relations locally.

### **SDLP**

SDLP members asked whether there would be a cap on the number of applications that the council would deal with per month.

### **Alliance Party**

Alliance Party members queried how this policy would work in relation to the electoral register how the policy would be applied in relation to non-residential occupiers of premises.

### **Sinn Féin**

Sinn Féin members were in support of the policy but queried why it had taken so long for the consultation to take place and asked when the policy would be in effect.



## **Progressive Unionist Party**

The Progressive Unionist Party raised concern that the proposed policy allowed for a single elected member to begin the process. They also stated that the proposed policy could be difficult if an attempt was made to apply it to what they described as “long streets”, these are streets with numerous homes with there may be some level of demographic variation between either end of the street. PUP member also queried the use of the word “reasonable” in relation to the policy and what this meant and how its interpretation could impact on the application of the policy.

Council officers also held a meeting with the Green Party who had no questions in relation to the policy. People Before Profit were offered a session to discuss this policy but did not attend.

## **Irish language community**

Council officers met with representatives from a range of Irish language groups including Conradh na Gaeilge, An tÁisionad, An Droichead, Raidió Fáilte, Foras na Gaeilge, Forbairt Feirste, Glór na nGael, East Belfast Mission, Cultúrlann McAdaim – Ó Fiaich and the Northern Ireland Place Names Project at Queen’s University.

Attendees were in favour of the proposed change, however did query a number of procedural issues in relation to the implementation of the policy. There was a strong opinion that the initial assessment of each application could be used to stop the application process before local residents were given the opportunity to voice their opinion. Attendees also suggested that opinions opposed to the erection of a sign which were clearly sectarian in nature should be disregarded from any assessment.

Attendees asked for a definition of good relation and equality of opportunity as they related to this policy and noted that the draft EQIA issued in relation to this proposed policy change stated that the erection of a sign in Irish did not constitute an affront to equality of opportunity.

The session closed with attendees noting that the policy should be highlighted in a positive manner through a communications exercise and that the Council should make staff and budget available to handle the increased numbers of applications.

## **Ulster-Scots Community**

Officers met with representatives from the Ulster Scots Agency and the Ulster Scots Community Network. The representatives noted that in general, local councils do not do much to promote the use of Ulster Scots and its visibility. They did not feel there would be a large demand for signs in Ulster Scots as those interested in the language were more interested in the history and heritage of the language as opposed to seeing it in signs.

The opinion was expressed that a threshold of 15% was low and that this had the potential to politicise this issue and harm good relations.

### **3.4 Collation of statistics from surveys**

As stated above, council officers felt it appropriate in this scenario to produce the survey in both English and Irish formats. The questions asked in each version are the same and the response to the surveys will be shown as follows:

- Statistics from the English version;
- Statistics from the Irish version;
- Combined statistics from both;

The reason for this breakdown is to give as comprehensive a picture as possible to the reader of the responses on this issue. It should be noted, however, that no guarantee can be given that individual respondents have not filled in the survey multiple times.

Respondents were presented with an outline of one of the proposed changes to the policy and asked to state if they strongly agreed, agreed, neither agreed nor disagreed, disagreed or strongly disagreed. Respondents were also given the opportunity to leave a comment under each question and these comments have added to the qualitative analysis in this report. Raw numbers and percentages in relation to each question will be given in tabular format with a discussion with some of the commentary and written answers following on from this.

### **3.5 Analysis and tagging**

In addition to the statistical analysis of the responses to the survey, officers conducted a tagging of the written commentary left by some of the respondents to the survey. Comments were tagged as either being in favour of or opposed to any of

the proposed technical changes to the policy. The tags developed were based on the key themes in the responses. Each response was also assigned a “sentiment summary”, that is tagged as being positive, negative, mixed or neutral. This then generates a graphic of positive and negative sentiment in relation to that proposed change. This is open to some small margin of error due to the potential for a response to be miscategorized.

There were repeated references throughout the responses to the potential cost of implementing a revised scheme, the potential for the revised scheme to cause division in certain areas and the assertion that the proposed 15% threshold is too low and equates to minority rule. In favour of the policy change there were references to the promotion of minority languages, Irish in particular, the assertion that the original policy is too stringent and places too much of a burden on residents and on bringing the policy into line with recommendations around international best practice on minority languages. The themes in the responses will be explored in greater depth later in this report.

### **3.6 Written submissions**

A number of written submissions were made during the period of the consultation and Equality Impact Assessment. Written responses were submitted by the Committee for the Administration of Justice welcoming the proposed policy but questioning how it interacted with the council's Equality Scheme. Responses were also submitted by Conradh na Gaeilge, An Droichead, Glór na Móna, Ionadh Uibh Eachach and Cumann Cultúrtha Mhic Reachtain. The content of these were largely the same and will be discussed in depth below. A translated example of one of these is included in Appendix 4.

## **4. Breakdown of responses**

### **4.1 Responses to the online survey**

There were 1078 responses to the online survey, broken down into 785 responses to the English language version and 293 responses to the Irish language version.

Throughout the analysis it was clear that there was considerable strength of feeling for and against the proposed change to this policy.

It should be noted that there was no method of stopping individual respondents from filling in both the English and Irish language versions of the survey or filling in one or each multiple times. A number of responses in both the English and Irish versions of the survey were tagged by analysing officers as “pro-forma response”, that is, the same or highly similar responses to questions were received multiple times in the survey suggesting a potential co-ordinated response to the survey.

The Equality Commission’s Guide to the Statutory Duties makes it clear that consultation should focus on the actual impact of the existing policy and the likely impact of proposed and alternative policies. The Equality Commission has also made it clear that an EQIA should not be considered as a referendum or plebiscite whereby the views of consultees from a majority are counted as votes to decide the outcome.<sup>1</sup>

The online survey results are included below which incorporates the responses to the survey in the English and Irish languages. A further breakdown of these figures is presented in Appendix 4.

#### **4.1.1 Responses to the survey (hard copy submissions)**

Two sets of hard copy versions of the survey were received in support of the proposed changes to the policy. Irish language advocacy and campaign group An Dream Dearg delivered a 274 copies of the survey (Appendix 2) and Sinn Féin delivered 1081 copies of the survey, again, strongly in favour of the proposed changes.

It should be noted that the hard copy submissions presented by Dream Dearg (274) are identical copies of the same response.

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In addition, the hard copy submissions presented by Sinn Fein (1081) are identical copies of the same response and are strongly in favour of the proposed changes to the policy.

These figures are considered separately from the completed online survey in the analysis below.

## **4.2 Breakdown by community background, age, gender, geographical location and relationship to Belfast**

### **4.2.1 Gender**

The majority of respondents to the English language version of the survey (62.7% or 496 respondents) self-reported as being male, with 29.3% (216) of the responses coming from women. The remaining responses came from people who preferred not to declare their gender for the purposes of this survey (3.3% or 24 respondents) and people who describe themselves as something other than male or female (0.3% or 2 respondents).

The responses to the Irish language version of the survey did not follow the same pattern with 45.8% (54) of the respondents being male, 49.2% (58) being female and 5.1% (6) respondents preferring not to say.

It should be noted that there is a discrepancy here between the number of people who filled in the survey and those who opted to fill in the questions to generate this type of metadata in the Irish language version. 175 of the respondents to the Irish language version of the survey opted not to answer this question making it harder to give an overall figure and percentage across both versions of the surveys for this.

Across the two versions of the survey 854 respondents opted to respond to this question with 65.4% (550) respondents describing themselves as male; 32.1% (274) describing themselves as female and 3.5% (30) preferring not to say. It can be seen, therefore, that the majority of respondents across both versions were male.

### **4.2.2 Community background of respondents**

Respondents were asked to indicate what community background they came from regardless of whether or not they actively practiced a religion. They were asked to indicate a Catholic or Protestant community background as it is felt that these

correspond to the two major community groups within Belfast and Northern Ireland as a whole. Respondents were also given the option to say that they belonged to neither the Catholic nor Protestant communities.

The majority of respondents to the English language version of the survey (41.2% or 294 respondents) stated that they came from a Protestant community background with 33% (235 respondents) coming from a Catholic community background. The remaining 25.8% of respondents (185) declared that they came from neither a Catholic nor a Protestant community background reflecting the increasing trend for people to not strongly identify with either religious group.

This pattern was not repeated in the Irish language version of the survey where 4.2% (3) respondents described themselves as being from a Protestant background, 56.9% (41) of respondents coming from a Catholic community background and 38.9% (28) respondents coming from neither a Catholic nor Protestant background. Again any analysis of these figures should bear in mind that the number of respondents to this question in the Irish language version of the survey does not tally with the overall number of responses to the survey. These figures, therefore, represent those who responded to this question not all of those who responded to the survey.

When the available statistics across both versions of the survey are accumulated there is little variation here with 37.8% (297) of all respondents describing themselves as coming from a Protestant community background, 35.1% (276) coming from a Catholic community background and 27.1% (213) respondents describing themselves as being from neither community.

#### **4.2.3 National Identity**

The survey asked for respondents to describe their national identity, giving them the options of British, Irish, Northern Irish, Other, English Scottish and Welsh.

The breakdown of responses to the national identity question in the English language version of the survey was as follows:

- British 36.8% (265).
- Irish 39.1% (282).
- Northern Irish 21.1% (152).

- Other 2.6% (19) and
- English 0.4% (3).

In the Irish language version of the survey

- Irish 81.9% (59)
- Northern Irish 8.3% (6)
- Other 9.7% (7).

No respondents to the Irish language version of the survey described themselves as British.

The question about national identity was not answered by the majority of respondents to the Irish language version of the survey with only 72 respondents filling this question in. Aggregate figures and percentages below, therefore, represent those who answered this question and not all of those who responded to the survey. Across both versions:

- 33.4% (265) of respondents described themselves as British;
- 43% (341) of respondents described themselves as Irish;
- 19.9% (158) described themselves as Northern Irish with
- 3.3% (26 respondents) describing themselves as “other” and
- 0.4 (3) respondents describing themselves as English.

#### **4.2.4 Age**

The breakdown of ages of respondents across the two versions of the surveys is as follows. These

results have been presented in tabular format for ease of reference.

**Table 1: Age of respondents to English language version**

Age range	Percentage	Number
Under 18	0.4%	3
18-24	9.8%	73
25-39	28.6%	213
40-54	31.4%	234
55-64	18.5%	138

65+	11.4%	85
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**Table 2: Age of respondents to Irish language version**

Age range	Percentage	Number
Under 18	32.3%	54
18-24	13.8%	23
25-39	32.9%	55
40-54	9%	15
55-64	6%	10
65+	6%	10

It should be noted based on the figures above that a significant number of respondents who filled in the Irish language version of the survey did not respond to the question about their age. The initial inference that can be drawn from the above statistics, however, is that there was a trend for respondents from the Irish language version of the survey to be younger than those who filled in the English language version. There is also a much higher occurrence of respondents under the age of 18 filling in the Irish language version.

**Table 3: Age of respondents across both versions**

Age range	Percentage	Number
Under 18	6.2%	57
18-24	10.5%	96
25-39	29.4%	268
40-54	27.3%	249
55-64	16.2%	148
65+	10.4%	95

The statistics above show that while respondents were spread across the age range there was a higher likelihood of responses coming from those in the 25 to 54 years of age range.



#### 4.2.5 Postcode

Respondents were asked to indicate what area of Belfast they lived in by postcode. A map of Belfast that shows areas by postcode is attached as Appendix 5. The data in the English language version of the survey shows a spread across the city but with a higher proportion of the postcodes representing the west of the city. Postcodes in the BT4, BT5 and BT6 areas representing east Belfast also featured heavily amongst the respondents to the English language version.

**Table 4: Postcode breakdown for English language version**

<b>BT1</b>	2.4% (13)	<b>BT2</b>	0.9% (5)
<b>BT3</b>	2.2% (12)	<b>BT4</b>	7.1% (39)
<b>BT5</b>	6.9% (38)	<b>BT6</b>	8.7% (48)
<b>BT7</b>	6.7% (37)	<b>BT8</b>	2.7% (15)
<b>BT9</b>	4.7% (29)	<b>BT10</b>	4.4% (24)
<b>BT11</b>	10.4% (57)	<b>BT12</b>	8.9% (49)
<b>BT13</b>	8% (44)	<b>BT14</b>	11.3% (62)
<b>BT15</b>	6.7% (37)	<b>BT16</b>	1.1% (6)
<b>BT17</b>	6.7% (37)		

**Table 4: Postcode breakdown for Irish language version**

<b>BT1</b>	4.4% (11)	<b>BT2</b>	4.8% (12)
<b>BT3</b>	4% (10)	<b>BT4</b>	0.4% (1)
<b>BT5</b>	1.2% (3)	<b>BT6</b>	0.8% (2)
<b>BT7</b>	4% (10)	<b>BT8</b>	2% (5)
<b>BT9</b>	1.2% (3)	<b>BT10</b>	1.2% (3)
<b>BT11</b>	24.1% (60)	<b>BT12</b>	23.7% (59)
<b>BT13</b>	3.6% (9)	<b>BT14</b>	20% (8)
<b>BT15</b>	2.4% (6)	<b>BT16</b>	0
<b>BT17</b>	14.1% (35)		

While previous questions requesting metadata had not been consistently answered in the Irish language version of the survey, it can be seen that a higher proportion of

respondents were prepared to indicate what part of the city they lived in. Again it can be noted immediately through both the numerical and statistical data that the largest group of respondents to this survey come from west Belfast. It should also be noted here that the Irish language version of the survey did not elicit the same number of responses from residents in the east Belfast postcodes.

**Table 4: Combined postcode breakdown across both versions**

<b>BT1</b>	3.1% (24)	<b>BT2</b>	2.2% (17)
<b>BT3</b>	2.8% (22)	<b>BT4</b>	5.1% (40)
<b>BT5</b>	4.8% (38)	<b>BT6</b>	6.1% (48)
<b>BT7</b>	6% (47)	<b>BT8</b>	2.5% (20)
<b>BT9</b>	3.7% (29)	<b>BT10</b>	3.4% (27)
<b>BT11</b>	14.9% (117)	<b>BT12</b>	13.7% (108)
<b>BT13</b>	6.7% (53)	<b>BT14</b>	8.9% (70)
<b>BT15</b>	5.5% (43)	<b>BT16</b>	0.8% (6)
<b>BT17</b>	9.8% (77)		

The combined statistics from the above table bear out the trend from the segregated breakdowns in relation to postcodes, demonstrating that the largest group of respondents to the survey came from the west Belfast area. Beyond this initial trend, however, the respondent sample covers the entire city with respondents coming from each postcode.

#### **4.2.6 Residency in and link to Belfast City Council area**

Respondents were asked to indicate whether or not they were residents or ratepayers in the Belfast City Council area and what specific link they had to Belfast. In the English language version of the survey 82.6% (615) of respondents indicated that they were residents or ratepayers, with the remaining 17.4% (130) saying they were not. Respondents to the Irish language version of the survey were overwhelmingly (94%/268) resident in the Belfast City Council area.

Respondents who were not residents in Belfast were then asked to indicate their primary interest in Belfast as an area. Respondents to the English language version of the survey were broken down as: NI resident – 68% (87); visitor to Belfast – 3.1%

(4); worker – 10.9% (14); student – 7.8% (10) and other 10.2% (13). When those who selected “other” were asked to specify their link to the city the most common response was that they were a former resident.

There were far fewer responses to this question in the Irish language version with only 14 respondents opting to answer this question. Of this number 14.3% (2) described themselves as NI residents, 21.4% (3) were visitors, 50% (7) were workers in the city, 14.3% (2) were students and no respondent selected “other”.

Across the two versions of the survey, therefore, the majority of respondents – 85.7% - were ratepayers or residents in the Belfast City Council area. Of those who indicated that they were not residents or ratepayers in Belfast 62.7% (89) were resident in Northern Ireland, 4.9% (7) were visitors to Belfast, 14.8% (21) were workers, 8.5% were students with the remainder of respondents selecting other.

#### **4.2.7 Summary and comment on respondent sample**

The survey yielded a total of 1078 responses. The majority of respondents were residents in the Belfast City Council area. Males (65.4%) accounted for the majority of responses to the survey. 35.1% of respondents described themselves as Roman Catholic, 37.5% as coming from a Protestant community background, with the remaining 27.1% describing themselves as coming from neither background.

In terms of national identity, the single biggest group, 43% described themselves as Irish, 33.4% as British and 19.9% as Northern Irish. The majority of respondents (56.7%) fell in the 25-54 age range. The single biggest groups of respondents came from the west and east of the city.

Metadata in relation to gender, age, community background, national identity or respondent relationship to Belfast was not provided for any of the hard copy responses that were submitted and the statistical data above reflects the responses to the online survey only.

#### **Hard copy submissions**

Sinn Fein submission (1081 copies)

Policy changes are referred to are as follows:

- A. 100% agree with the removal of initial petition and allowing one resident to begin application process
- B. 100% agree with proposed lowering of threshold from 67% to 15%  
Respondents are asked to explain their answer and all responses have a pre-prepared written response saying the previous threshold was undemocratic and not in keeping with international best practice.
- C. 100% in favour of the proposal to no longer categorise non-responses as not being in favour of the erection of a street sign  
  
Respondents are asked to explain their answer and there is a preprepared written response stating that no other council has this provision in their policy and that this creates an undue barrier.
- D. 100% agree proposal to screen each application under the proposed policy –  
Respondents are asked to explain their answer and are there is a prewritten response saying there was a similar question in the consultation regarding bilingual signage in leisure centres.

The following sections are numbered:

All respondents presented a preprepared statement stating that the adoption of the proposed policy would make Belfast one of the leaders in the protection of minority rights.

There are references to international treaties and a paragraph in Irish stating that bilingualism enriches day to day life and that the visibility of languages is important in their promotion.

Submission by An Dream Dearg (274 identical copies) included:

- 100% in favour of the proposed policy stating that only the following persons may apply: an occupier or occupiers of the street, an Elected Member representing the District Electoral Area where the street is located or a developer.
- 100% in favour of the proposed policy requiring 15% of the occupiers of the street to be in favour of the application for a dual language street sign. If that

threshold is reached, a report will be brought to committee to consider the application.

- 100% in favour of the proposed policy removes the presumption that you are not in favour of the application if you do not return a survey. Only those indicating that they are not in favour of the application will be deemed to be so.
- 100% not in favour of the new policy requiring an assessment of each application to identify and inform the council of any equality of opportunity, good relations or rural needs implications.
- 100% not in favour of the council retaining a discretion to depart from the policy. The respondents all agreed that they wanted the opportunity to give their view.

### **Submission from Irish language groups**

As discussed above in this report the Council received submissions in Irish from Conradh na Gaeilge, Cumann Cultúrtha Mhic Reachtain, Ionad Uibh Eachach, Glór na Móna and An Droichead. These each followed a similar pattern, with an introduction specific to the group explaining their background and the services they provide. There is an explanation of the proposed changes to the policy, a discussion of Section 75, issues surrounding language and good relations issues, and domestic and international agreements and their references to language. The submission then lays out the questions in the survey explaining that the groups strongly agree with the changes to the policy but are opposed to the proposal to screen each application individually. There is also commentary on the draft EQIA which discussed good relations and language issues. The submissions conclude with a range of examples of best practice from other councils and as well as guidance from Wales and Scotland. A translated example of this submission, in this instance the Conradh na Gaeilge submission, is included at Appendix 4.

## **5. Consultation questions**

Respondents were asked to give their opinion on four of the five proposed technical changes to the policy by indicating whether they Strongly Agreed, Agreed, Neither Agreed nor Disagreed, Disagreed and Strongly Disagreed with each of the proposed

changes. Respondents were also asked to provide comments on the fifth proposed technical change and were asked also to comment on any aspect of the proposed policy that had not been addressed by the preceding questions. Respondents were also given the opportunity to make their opinions known on the Equality Impact Assessment running concurrently to this consultation and on the draft Rural Needs Impact Assessment.

As well as indicating how strongly in favour or opposed to four of the proposed changes, respondents were given the opportunity to provide a comment or opinion on each of the proposed changes. It should be noted, however, that the comments underneath each proposed change did not always correspond to that change. Respondents would often leave a generic comment in response to the policy proposal as a whole rather than commenting on the technical point being highlighted in that question. It should also be noted that respondents were less likely to leave a comment the further they went into the survey. There are fewer comments, therefore, against the proposed changes that are outlined later in the survey.

Each question in relation to a proposed change described the current policy position and the proposed change. The rationale for presenting each proposed change and asking for feedback on each of these was to maximise the volume of feedback on the individual changes and to allow respondents to see each proposed change in comparison to the current policy position.

## 6. Discussion of responses to each proposed change

The following section gives a breakdown of the numerical and percentage responses in favour of and against each of the proposed changes. These are broken down across both versions of the survey and an aggregate percentage and numerical value are then given. This will be followed by a discussion of the qualitative comments raised about the proposed change.

Officers were able to assign a “sentiment value” to each comment left under a proposed change in the English language survey, that is, to mark it as being positive, mixed, neutral or negative. It should be noted at this juncture that the majority of responses to the surveys and the combined total were in favour of the changes to the policy. The majority of written responses to each change, however, were negative comments opposed to the change.

### 6.1 Proposed change to application method

The proposed change removes the requirement for a petition of support of one third of the occupiers of the street to accompany an application and provides that only an occupier/s of the street in question, Elected Member representing that District Electoral Area or a developer may apply.

**Table 7: Responses in relation to the proposed removal of the initial petition and allowing a single occupier, elected member, occupier or developer to begin the application process**

	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree nor disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>English language version</b>	286 (36.7%)	55 (7.1%)	9 (1.2%)	25 (3.2%)	405 (51.9%)
<b>Irish language version</b>	284 (97.3%)	7 (2.4%)	1 (0.3%)	0	0
<b>TOTAL</b>	570 (53.2%)	62(5.8%)	10(0.9%)	25(2.3%)	405(37.8%)

It can be seen that the majority of respondents to the English language version of the survey, 55.1%, were opposed to these proposed changes. The overwhelming majority of respondents to the Irish language version, 97.3% were strongly in favour of the change. The combined total showed that 59% of responses across the survey were in favour of the change with 41.1% on the whole being opposed.

#### **6.1.1 Commentary and key themes in relation to the proposed change**

There were 509 comments in relation to this change in the English language version of the online survey (68.8% of these were categorised as being negative, with 26.7% of the comments being marked as positive). Officers reviewed each comment and developed 'tags' to determine themes. Those not in favour of the proposed change highlighted the costs associated with the policy and often commented that the erection of second language street signs is a 'waste of money' or that the money would be better spent elsewhere, for example the NHS or education. Respondents also commented that the proposed change for applying for a second language sign would not be democratic since it would allow for 'minority rule' and that there is 'no need' for second language street signs because a minority of the population can read Irish but everyone can understand English.

Another issue which was mentioned repeatedly in commentary opposed to this change was that this policy or the erection of Irish language signs has the potential to alienate one section of the community and cause 'division' and 'tension' in communities and could enflame community relations. Concern was expressed that second language street signs would be akin to 'marking territory' and that the Irish language would be 'weaponised'. Respondents noted that because the topic is 'contentious', there should be 'community support' for such signs before they are erected. There was concern expressed that this change in policy could lead to second language street signs being 'imposed' or 'forced' on streets where they are not wanted. Respondents commented that the proposed change to the application process 'reduces the bar' and could mean that divisive applications may be made.

The majority of comments relating to Members and developers being able to apply for a sign were negative and concerns were expressed that an application should not come from someone who does not live on the street in question or the area and that



with regard to Members making applications, the process would 'politicised'.

Respondents noted that this process should be 'resident driven'.

A repeated theme that became apparent from these comments was the perception that this issue is being actively promoted by Sinn Féin for political ends and that this policy can potentially be used to have Irish language signs erected in areas where the majority would not want this. There are repeated references in the comments to Sinn Féin, republicans and the potential for elected Members to use this against the Protestant or Unionist community.

A number of comments were tagged as 'PUL community' and the strength of feeling in these comments was notable. Respondents commented that 'we are British not Irish' and that the proposed policy changes are 'not inclusive of the Unionist population'. Respondents noted that the proposed signage is 'divisive', will lead to 'marking of territory' and will 'alienate Unionists for a language that is barely used'.

Several respondents commented negatively on the proposed policy change of having one person apply without an accompanying petition. Comments included that this could cause 'friction', that the signs need more of a 'mandate from residents' and that this 'reduces the bar' which could lead to 'confrontation'.

As stated above 26.7% of responses were marked as being positive, that is in favour of the change. These comments tended to focus on the promotion of Irish and minority languages and how the proposed policy change was in keeping with international best practice. Frequent references were made throughout the commentary that Irish is a minority language and an indigenous language to all of Ireland and therefore should be promoted. The written comments highlighted the importance of preserving the Irish language and increasing its visibility. Respondents also commented on how the Irish language is the 'native tongue' of society and that it is an important part of cultural heritage and tradition. Respondents also noted that the proposed change in method of application for a second language street sign would remove 'barriers' and 'obstacles' for applicants and that the requirement of the initial petition was 'prohibitive', 'unnecessary' and posed a 'barrier' for applications. Those in support also noted that Irish speakers should be afforded 'equal rights' and how inclusion in a shared society is important.

A range of comments also referenced the international agreements and guidance in relation to the promotion of Irish and that making the language more visible creates a shared space which is welcoming to all. Respondents also referenced the current policy and a number of comments around this noted that it placed an undue burden on residents and that the 66% threshold was an undue barrier to the promotion of minority languages. A number of comments also opined that the promotion of Irish or any minority language cannot be considered offensive or an infringement on the rights of others.

The Irish language version of the survey elicited overwhelmingly positive responses in relation to this proposed change although a sentiment summary analysis was not possible on the Your Say Belfast platform for this version of the survey.

Respondents here again described the current policy as unnecessarily prohibitive against the promotion of minority languages and that the new proposed policy was more suited to their promotion. There were references to international standards and best practice and to the idea that the promotion of minority languages is in line with the promotion of human rights and equality.

## **6.2 Proposed change to the threshold for further consideration of an application**

The proposed policy includes a reduced threshold for an application for a dual language street sign to be considered by committee. The proposed change would mean that 15% of returned responses being in favour of the proposed erection of the dual language sign would be sufficient for this to be sent to committee for consideration.

**Table 8: Responses to the proposed change to the policy to lower the threshold for an application to be considered to 15%**

	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree nor disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>English language version</b>	300 (38.5%)	45 (5.8%)	6 (0.8%)	18 (2.3%)	410 (52.6%)
<b>Irish language version</b>	287 (98.3%)	5 (1.7%)	0	0	0
<b>TOTAL</b>	587(58.2%)	5(0.5%)	6(0.6%)	0	410(40.7.%)

### **6.2.1 Commentary and key themes in relation to this proposed change**

Overall, there was a majority in favour of the proposed change across the survey. The commentary beneath each version of the survey however, did show considerable strength of feeling both for and against the proposed change. Again it should be noted that the majority of written comments in relation to this report were opposed to the change, with 68.7% of the responses in the English language version being tagged as negative in the sentiment summary function.

Within the negative commentary there was a strong emphasis on the perception that this proposed change allows the minority to make a decision for the majority of a street. A range of respondents felt that having this lower threshold allowed for “minority rule” and that this had the potential to damage community relations and could become a factor in intimidation. Respondents commented frequently that the reduced threshold of 15% was ‘too low’ and would ‘overrule’ or ‘dictate to’ the 85% ‘majority’ of occupiers who were not supportive of a second language street sign. This in turn would ‘impose’ or ‘force’ second language street signs and would be ‘inflammatory’, cause ‘societal problems’, ‘tension’ and ‘division’, lead to ‘resentment’ and ‘damage community relations’. Comments were made that this would make the Irish language a ‘political weapon’. Respondents also noted that a minority should

not be allowed to 'drive change' and that 15% is not 'democratic' and does not represent a 'consensus', especially given the 'contentious' nature of the issue. Respondents offered suggestions of alternative thresholds, which included keeping the status quo of 67% and having a simple majority of over 50%. The cost of second language street signs was commented on in a negative manner with respondents stating that they are a 'waste of money' and that 'ratepayer' money should be spent 'more wisely' on 'NHS' 'serious deprivation and social issues'.

In the positive comments there were frequent references to support for 'minority rights' and the Irish language in particular and how the lowering of this threshold makes it easier for residents to have the language of their choice displayed in a street sign. Respondents commented that 'visibility' of the Irish language is important. Those respondents who commented favourably on the proposed change in threshold stated that the current threshold of two-thirds is 'too high' and 'undemocratic' and that the proposed threshold is more 'reasonable', 'realistic' and 'suitable for a minority language'. Reference was also made to the lack of promotion of the Irish language within Northern Ireland and how this policy would go some way to redressing this. The theme of UN and international guidance around minority language issues also feature in the positive responses to this question with numerous respondents saying that the proposed change was in keeping with 'best practice guidance'. Several responses alluded to the growth of Irish medium education in Belfast and how there are now areas of the city where there are higher proportions of Irish speakers. Respondents also commented that the reduced threshold would respect the rights and views of 'linguistic minorities', 'new communities' and other ethnic groups and is more 'minority compliant'.

This question also elicited a number of what would be described as "pro-forma responses" or variations on pro-forma responses. These frequently referred to the UN Special Rapporteur guidelines on this issue and suggested that a lower threshold, potentially 5%, would be more acceptable and indeed make this process easier for residents.

### 6.3 Proposed change to clarify how responses to the survey are classified

The current policy in relation to the erection of dual language street signs contains a provision in which the number of non-responses to the survey of occupiers on a street are deemed as being not in favour of the proposed sign. The proposed policy will not count these as being either in favour of or against the erection of a street sign. The number of non-responses will be listed along with the votes in favour and against the erection of a sign and this information will be passed to committee.

**Table 9: Responses to the proposal to not count non-responses to the street survey as being opposed to the erection of a dual language sign**

	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree nor disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>English language version</b>	321 (41.5%)	48 (6.2%)	31 (4%)	38 (4.9%)	335 (43.3%)
<b>Irish language version</b>	290 (99.3%)	1 (0.3%)	1 (0.3%)	0	0
<b>TOTAL</b>	611 (57.4)	49(4.6%)	32(3%)	38(3.6%)	335(31.4%)

Again it can be seen that overall across the survey that the majority of respondents are in favour of this proposed change. Opinion was divided almost equally in the English language version, with 47.7% of respondents agreeing or strongly agreeing with the change, and 48.2% being opposed. Responses to the Irish language version of the survey being overwhelmingly in favour of this.

#### 6.3.1 Commentary and key themes in relation to this proposed change

Again a similar trend is borne out in relation to this proposed change as is seen with the other changes with 60.4% of written responses being marked as negative and opposed to the change with 31.4% of responses being positive. It can be seen again therefore, that despite the majority of responses to the survey being in favour of the proposed change there is still considerable strength of feeling in opposition to it.

Many of the comments opposed to this change focused on the perception that this change allows for “minority rule”, and that a clear majority of respondents should be required to effect any change. Comments frequently focused on the potentially deleterious effect this would have on good relations. There was also a common misconception in relation to this proposed change with a range of comments indicating that the respondent felt that a non-response would now be counted as being in favour of the erection of a sign, which was considered to be ‘absurd’, ‘unjust’ and ‘unfair’. Those not in favour noted that the onus should be on the people wanting the street sign to respond to the survey and that the current policy should remain. Respondents expressed concern that those who disagreed could be ‘identified’ or ‘feel pressure’ to respond, which creates the potential for ‘hate crime’ ‘retaliation’ or that this will ‘stir up trouble’. Comments were made to the effect that the current policy or ‘status quo’ should remain. A handful of comments presupposed that the street survey would be online and expressed concern about accessing it, stating that not everyone has the ‘technology’ or is ‘computer literate’ to be able to respond. The majority of comments tagged as ‘opposed’ did not respond directly to this technical point but rather commented on other aspects of the policy or negatively generally.

The responses in favour of the proposed change again centred around a number of key themes and concepts. The most frequent of these was that the previous policy assumed that a non-response was not in favour and that this was not good practice and not reflective of practice in any other referendum or plebiscite. Again there was another pro-forma response stating that no other council has a provision like this in their policy for erecting dual language street or road signs. Those in favour noted that it makes sense not to ‘presume’ an answer from a non-response, that ‘no opinion can be derived’ and that an ‘explicit confirmation’ should be given.

Respondents also commented that it’s ‘fair’ and ‘logical’ that occupiers must ‘actively engage’ to express an opinion. Further comments stated that only responses that are returned should be considered. Comments in relation to this in the Irish language version of the survey were overwhelmingly in favour of the proposed change with comments being of a similar nature.

## **6.4 Proposal to assess each application for equality, good relations and rural needs implications**

The proposed policy will require an assessment of each application to identify and inform the council of any equality good relations or rural needs implications. This assessment will be based on local information and data and that if deemed necessary, a fuller equality screening or possibly an Equality Impact Assessment may be carried out on an application.

**Table 10: Responses to the proposal to assess each application for equality, good relations and rural needs implications**

	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree nor disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>English language version</b>	262 (33.9%)	147 (19%)	135 (17.5%)	30 (3.9%)	198 (25.6%)
<b>Irish language version</b>	181 (62.2%)	5 (1.7%)	6 (2.1%)	5 (1.7%)	94 (32.3%)
<b>TOTAL</b>	443(41.7%)	152(14.3%)	141(13.3%)	35(3.3%)	292(27.4%)

### **6.4.1 Commentary and key themes in relation to the proposed change**

It can be seen that the majority of respondents to each version of the survey are in favour of this change with a combined total of 56% of respondents being in favour. An assessment of the commentary in relation to this did, however, show that there was some opposition to this change.

50.9% of the comments left a response to this were tagged as being “negative” in the sentiment analysis. Frequently these comments do not refer to the specific change being examined in this question but are comments on the proposal to change this policy as a whole. There were references to the perception that this policy would allow for “minority rule” and that it would result in the Council “forcing” the Irish

language into areas where it was not wanted. Comments specifically in relation to this proposed change offered the opinion that a further assessment was a 'waste of ratepayers' money' and that any assessment could be 'easily manipulated' and 'gameable' by one section of the community, leading to division. Concern was expressed about 'potential malicious misapplication' in terms of how 'anyone can identify as whatever on a form to change results'. Respondents also commented that the process sounds 'unnecessarily bureaucratic' and that that it would be 'expensive'.

A number of comments did, however, give the opinion that any equality exercise could potentially be used to stop any application for a dual language street sign. An example of this type of comment is below:

- Each resident, regardless of their street, should have the right to indicate their preference via the Council's street survey. This clause means that council can potentially override this right, and make assumptions which could lead to the dismissal of an application. I strongly recommend that this clause is removed, and if that's not possible, that it is removed from the beginning of the process, until there is a clear picture of residents views from the street survey.

It was also suggested in some comments that as the overall policy change was subject to a Section 75 equality screening and an Equality Impact Assessment that any further screening of individual applications would be 'excessive'. There was also some commentary around the fact that seeing a minority language in a sign cannot create an inequality of opportunity and therefore there is no need for an assessment for each application. Of the 44 written comments in Irish the majority (39) of these were opposed to this proposed change on the grounds that respondents felt it unnecessary and excessive to carry out an assessment on each application.

Commentary in favour of this change suggested that the assessment would help build a clear picture of local demographics and opinion which would aid the decision-making process. Some respondents felt that this would add to the transparency of the process and help to potentially avoid division and damage to good relations. Those in favour of this proposed change commented positively on 'further scrutiny' and 'detailed equality screening' and highlighted how this was important due to the potential for 'quite serious outcomes' and 'community disagreements'. Respondents



commented on the importance of the 'entire process' being open to more 'scrutiny and assessment' and on the importance of 'fair' and 'balanced' decisions. The theme of 'community support', 'maintaining good relations' and the council's consideration of 'local knowledge' and 'local opinions' were also included in the comments in favour of this proposed change.

## **6.6 Comments on the draft Rural Needs Impact Assessment**

Comments in relation to the draft Rural Needs Impact Assessment which accompanied this consultation were tagged as being 40.1% negative in the sentiment summary analysis. 56.7% of the comments were tagged as “neutral” given that many of the respondents simply answered “no” to this question. Much of the negative commentary related to the proposed policy change as a whole, not to the Rural Needs Impact Assessment with comments regarding the perception of “minority rule” and cost featuring here as well as statements in outright opposition to the proposed policy change. There were three positive comments to this question, with respondents noting that the RNIA seemed “more than competent” and one stating that the proposed policy change “should be implemented”.

## **6.7 Proposed change to explain the operation of the council’s residual discretion**

Respondents were asked to give their opinions on the potential exercise of the Council’s residual discretion in relation to this policy. Belfast City Council has always had residual discretion in relation to this policy which allows for the relevant committee, with proper advice, to take a decision which may depart from the parameters of the policy. The proposed policy sets out the factor which may be considered in any instance where the Council opts to use its residual discretion. These include but are not limited to:

- The views of the occupiers of the street
- The results of the assessment of each application to identify equality, good relations and rural needs implications
- Local context of the application
- Any other relevant council policies
- All material considerations relating to the application

Respondents were asked to give their opinions on these factors. 49.6% of the commentary in relation to this was negative, with 12.1% being tagged as positive and 35.3% being neutral. Many of the negative comments around this again focused on the policy as a whole, not this technical change with reference being made to cost, and the perception that this policy could lead to division. There were, however,

a number of comments in relation to how residual discretion may be applied. Some respondents felt that the residual discretion clause gave the council the power to 'depart from' the policy and 'override' the street survey on this issue and go against the wishes of residents. Further comments noted that this residual discretion should not override their 'international obligations' regarding language rights or the protection of minorities and concern was expressed that council discretion could go against the wishes of the residents by 'imposing its own decisions'.

One issue that occurred repeatedly in relation to this potential change, especially in the comments on the Irish language version, was that arguments or opinions which could potentially be deemed to be sectarian should not be considered in relation to the application of residual discretion. Respondents also commented that the council is under a 'legal obligation' to seek the views of residents when an application is made, that residual discretion should only be used at the end of the application process and that potential applications for street signs should not be stopped before residents have had the opportunity to voice their opinion 'as is clearly laid out in law'.

Positive comments in relation to the exercise of residual discretion welcomed the clarification as to what potential factors would be considered in relation to the residual discretion and that this added another level of accountability to the process and gave another method for residents to have their say on any application. Those in favour commented that this 'sounds sensible' with 'everything taken into consideration' and it is good that 'further clarification' and 'clarity' has been provided as to when the council can depart from the policy. Respondents in favour of this proposed change also highlighted the importance of 'transparency' of the council's decision making process' and noted that the council should 'fully explain' and provide 'written disclosure' of its decisions and rationale. Further comments noted that this would bring the council 'into line with other progressive councils' and see the council 'become a leader' in the protection of minority language rights.

Some respondents sought clarity on the factors that may be taken into consideration in the council's residual discretion and questioned if the 'ambiguity could be exploited'. Another theme apparent in the comments was the importance placed on the views of the occupiers of the streets in question and how these should be 'paramount', 'take preference' and be 'given significant weighting'.

## **6.8 Other comments on the proposed policy**

Respondents were given the opportunity to make any other comments they wished on the proposed policy. Similar themes in opposition to the policy change came to the fore in this section.

Respondents in favour of the proposed change said they felt that the new policy would bring Belfast City Council into line with international guidelines on these issues and that any policy change would promote the Irish language in a positive manner. Those who commented positively and were tagged as 'in favour' welcomed the proposed policy and highlighted the 'identity of growing Irish speaking community', the 'burgeoning and blossoming Irish Language community', the importance of 'greater visibility' for the language and how it should be 'reflected in the signage' of the city. Reference was also made to how the Irish language is 'truly independent of creed, class and identity, while creating a vital link to our shared past' and how 'inclusion and mutual respect can create conditions for an enduring peace in NI'. Twenty-one respondents provided a pro forma response which noted that this policy would see Belfast become a 'leader in the protection of minority language rights' and would 'meet its obligations under - European Charter for Regional and Minority languages (Treaty no. 148) - Framework Convention for National Minorities (Treaty no. 157)'. Three respondents submitted a comment to the effect that the EQIA documents 'clearly state that bilingual signage is a neutral action which is in line with political agreements and international covenants and charters'.

Those who commented negatively on the proposed policy noted that it is 'divisive', has the 'potential to ghettoise Belfast', will 'seriously harm good relations across this city' and has the scope to 'stir up tensions'. Respondents again referred to cost, noted that council resources are 'stretched to the limit' and that in these 'austere times' the money would be better spent elsewhere.

## **Appendix 1: Themes Emerging from Online Consultation Comments**

Respondents tended to either agree or disagree with the consultation questions and there were very few neutral comments. Therefore, officers tagged most of the comments as being either 'in favour' or 'opposed' to the proposed policy changes.

These comments were further analysed by officers, who identified themes.

### Those not in favour of proposed changes

The themes emerging from those not in favour included: cost, division, the need for majority support, 'no need' for dual language street signs and comments related to Elected Member or developer input.

The following is an example of comments by theme of those who were not in favour of the proposed changes. These have been copied directly from the consultation:

#### **Cost**

- Absolutely NO need for a language other than that which is the language of the country and understood by everyone. Complete waste of taxpayers money which should be used for the NHS which benefits everyone.
- Glad to hear Belfast City Council has surplus money for street signs. Please direct it to healthcare, policing, schools. When these areas are well funded then let us look at street signs.
- Removing the requirement for a petition will only increase the number of applications, causing increased costs for the council
- Constantly hearing about no money for health/education etc. The last thing we need is money wasted on dual language signs. Fed up with Irish language being weaponised by Sinn Fein.
- No Irish street signs as the majority in NI do not speak or understand the language. Therefore to put signs up would be a major waste of public funds.
- More important things to be spending rate money on
- Shouldn't have dual language signs complete waste of money
- waste of ratepayers money at a time when people are struggling to heat their homes

- An absolute waste of public money, everyone in Northern Ireland can read English, no need to change street signs into Irish as only a selected few will be able to read them
- Waste of money with so much going on least of Belfast worries better bus service more housing etc

## **Division**

- There must be clear evidence that at least one third of the street agree before it is proposed potentially causing conflict amongst neighbours.
- Dual language street signs are politically divisive. Residents may be afraid to object to the erection of such for fear of being targeted by the more outspoken who esteem themselves to be politically correct and inclusive.
- It will cause tension and hostility in the Protestant community
- This policy is incredibly divisive that will pit mixed residents in mixed residential areas against one another.
- This will lead to marking of territory and will alienate Unionists for a language that is barely used. This is purely sectarian.
- Unnecessary and will only continue to divide communities and create tensions where such tensions don't exist
- This will lead to marking out a territory which will cause more conflict within the area. Most people don't want this to happen and is only being pushed in to cause more division.
- This signage you are proposing is too divisive. In an already divided city. An does not take into consideration what people from the PUL Community want.
- Any application should have the support of a sizeable portion of the community to avoid unnecessary community tension.
- This proposed policy is a recipe for conflict and division
- This idea is open to abuse. Unless the majority of a street are in favour, ie beyond current policy, there is a danger here that those outside an area can exert influence to drive a change that a silent majority may then feel it's at ease to oppose. It is open to 'activist' manipulation and bullying coercion. It will also marking of territory akin to painting kerbs.
- There is no need to waste rate payers money on dual signage we are educated in the English language all Government and business is conducted

in English dual signage will benefit no one, No one is discriminated against this just serves to reinforce division in this land If one day there is a poll which favours an all Ireland then that would be the time to change street signage as a rate payer and citizen of Belfast i do not give my consent to change the status quo.

- An extremely divisive idea in already heightened sectarian times. Certain parts of a belfast already have the dual signage, we don't need it everywhere. The needs of the many who speak and use English, should out way the needs of the few who use Irish & already have it in their area.

### **Majority Support**

- Should be a clear majority in the street or location in favor, otherwise this will prove divisive in an already divided city
- All occupants at least 90% in the street must agree before changes can be made to street signs with English as the Universal language there is really no need to add any other language... waste of money at this time  
NHS, EDUCATION ETC more important issues
- Proposed dual signage has to also show support within an area where they are to be erected. Imposing a language in an area without local support would be using the language as a cultural weapon rather than promoting the language as a shared language
- A majority of residents should be in favour otherwise it should not be forced onto them.
- The current policy allows for a demonstrable level of support for change. The proposed policy is open to abuse by those keen to cause societal trouble or make political gain from their position
- To have a Irish street sign there must be a majority of residents voting for it otherwise it will be in my view anti democratic to have only %15 of people who are able to over rule %85 that is blatant discrimination.
- 15% is not a representative percentage in any democratic society. Any council who forced a minority decision against 85% of street residents would end up in civil action and cause community tensions.
- I have no problem with a street sign being proposed, but only if the majority of residents in that Street were to apply for it.

## **No Need**

- Absolutely NO need for a language other than that which is the language of the country and understood by everyone. Complete waste of taxpayers money which should be used for the NHS which benefits everyone.
- There is no need for this waste of money. The vast majority of people do not speak or read Irish.
- There is no need. The Irish speaking numbers are so tiny! Just a waste of money!
- We don't need dual language signs the majority of people speak English and only a very small minority speak Gaelic. How you apply does not need to be changed to make it unfair for those who do not agree with dual language signs.
- An absolute waste of public money, everyone in Northern Ireland can read English, no need to change street signs into Irish as only a selected few will be able to read them

## **Elected Member and Developer Input**

- Better to leave it up to the people that live there, it is their Street.
- Elected representatives should be excluded from ability to nominate streets, as SFIRA are absolutely biased in this matter and are using Irish language as a weapon of division in our city"
- Should be resident driven
- Not in favour of elected member proposing change.
- An elected representative or a developer may not hold the same views/may be in disagreement with the residents living in an area and therefore I believe the current policy is the fairest.
- Nobody but the occupiers HOME OWNERS should have the right to apply for dual language not someone who may live 20 miles away current policy to stay
- Disagree with removing the requirement for 1/3 of residents of the street to support the application. Would also say that only those living on the street should be allowed to propose. NOT a politician... this shouldn't be a political process, it should be resident driven.



- It should be residents of the street who apply, not an elected member of the DEA who may not live in the street.
- Elected officials should not have a vote unless an occupier of the street
- The street should agree before making the application. It is not up to an Elected Rep to make an application before consulting the residents.
- To gain dual signage it should have a considerable amount of support from people in that street as previously was the case and not be able to be applied for from people who do not live in that specific area.
- For additional signage, plus the costs, upkeep and maintenance of the same should have the majority of the residents of the street in favour before being considered. The proposed policy could allow someone from outside the area with zero support on the street in question propose changes that everyone on that street is opposed to.
- My elected representative does not have the same political views as the residents off my street for one. I'm sure that is the case over other areas in Belfast
- It is not right to remove the need for a petition of support from residents of the street. I also feel that applicants should be residents, not politicians or developers who, more than likely, do not live in the area.
- So an elected rep or a tiny minority can dictate a bilingual policy. The passing dogs can mark the lamp posts. I applaud you for a policy designed to sow seeds of discord. It will undoubtedly succeed
- Dual language street signs are a contentious issue, therefore it is essential that the majority of occupiers of the street actively support the proposal for change. I believe that requiring one third of occupiers to support the application is the right proportion to get the conversation started in the street. It demonstrates that a significant proportion of the occupiers want change which will be more meaningful and engaging for the rest of the occupiers than a proposal from an individual. The proposal for change should originate from a substantial proportion of the occupiers (one third is a good proportion), not anyone else, elected or otherwise.

- This means others from outside the area can submit changes for residents who don't want a sign with a language most of the population don't understand. This creates tension and is a waste of money.
- An elected representative or a developer may not hold the same views/may be in disagreement with the residents living in an area and therefore I believe the current policy is the fairest.
- It is not right to remove the need for a petition of support from residents of the street. I also feel that applicants should be residents, not politicians or developers who, more than likely, do not live in the area.
- The proposed policy takes away the consent of those living on the street. A developer can impose his ideas regardless of the views of the occupants.

#### Those in favour of proposed changes

The themes emerging from those in favour of the proposed changes included: references to culture, heritage and tradition; equality and inclusion; removal of barriers; visibility of the Irish language and references to best practice under the UN Special Rapporteur guidelines and other applicable frameworks and law.

The following is an example of comments by theme of those who were in favour of the proposed changes. These have been copied directly from the consultation:

#### **Culture, heritage and tradition,**

- I believe it is important to retain Irish language in Ireland to support culture and tradition.
- I feel the Irish language is an important part of everyone's history and culture. In 2021 it is time that this was recognised. Therefore, it should be easier for residents in the city to have their culture and heritage acknowledged where they live.
- We live in a society where almost 11% of the population speak the native tongue street signage should reflect this.
- Irish is the native language of the country and is part of our culture. It should be made easy for our streets to have the Irish street signs added.

- As part of the island of Ireland we should be embracing our cultural heritage and help make the Irish language more accessible and part of every day life in the north of Ireland
- The protection and promotion of the Irish language is of National importance to our heritage. Very positive policy movement. I would love to see all signs in dual language as policy (thought recognise this is an iterative process).

### **Equality and inclusion**

- Dual signage is important for equality.
- I live in a bilingual community and I believe that the Irish language and speakers should be afforded equal rights
- We want a city of equals, therefore the Irish language must have parity of esteem
- A shared space should be inclusive of all, therefore if a person living in the area speaks a different language it should be celebrated and accepted
- The Irish language has to be seen and its something to be proud of. The language belongs to us all and enriches us all.
- An inclusive society. My child goes to an Irish school and speaks the Irish language. All children should be able to see an all inclusive island that allows all languages to be spoken, promoted and respected. That be ulster scots, gaelige, english, chinese and so forth

### **Removal of barriers**

- The current policy poses a substantial barrier for most streets, preventing the views of residents being heard. The new policy allows for a simpler and more straightforward process that is more responsive to the desires of residents.
- This removes the obstacle for the resident who wants a bilingual street sign.
- The current requirements are unfair and disadvantage minorities
- I support the proposal to make it an easier process for the application to go ahead, removing barriers.
- I feel the requirement for a petition showing the support of not less than one third of the occupiers of the street in question was prohibitive and unnecessary, therefore, I strongly agree and support the new proposal.

- It makes the process less complicated and in the case of someone who lives in a house with 5 more Gaeilgeoirí, is much more minority compliant. This initial step placed a barrier before the process even begun.
- I feel it is important that this process is facilitative rather than prohibitive to enable progress on dual language signage.

### **Visibility of the Irish language**

- I strongly agree as I believe this is a way to preserve the Irish language  
Strongly agree that visual language identity should be more easily achieved in line the rapidly growing Irish speaking community in the city of Belfast.
- Improved visibility of the Irish language is very important
- Visibility in line with international standards should be made as easy as possible

### **Best practice / UN guidelines**

- I believe that the previous method through which bilingual signage could be applied for wasn't based upon best-practice nor was it in keeping with International and European Agreements in relation to minority languages. Therefore, I would like to see the method changed to that which is being proposed.
- I strongly support this change because it removes the onerous requirement of having to survey everyone on a street. It also makes it easier to have dual signage adopted and to meet minority language requirements.
- The EQIA documents which are published alongside this consultation clearly state that bilingual signage is a neutral action, an action which is in line with political agreements and with international covenants and charters, which have been ratified by the British Government and recommended by the Department for Communities
- Belfast is the second biggest city on the Island of Ireland and has fast growing Irish speaking community. Irish language legislation was agreed in New Decade New Approach Agreement and BCC

## Appendix 2: Submission from An Dream Dearg

### Belfast City Council's street signage policy Public consultation

Name:

Date of Birth:

Postcode:

Currently, if you wish to erect a bilingual street sign in your street, you must go door-to-door and gather names from 33% of residents in the street to start the process. The new policy recommends that this clause is removed, and the process can be initiated by you, an individual resident. This is much more straight forward.

I agree with the proposed change

Under current council policy, the Council will conduct a street survey to collect the views of residents regarding the erection of a bilingual street sign. This survey must gain support from 67% of residents in the street. The updated policy recommends a more minority-compliant threshold of support of 15% of residents.

I agree with the proposed change

In Belfast City Council's current street signage policy, if a resident doesn't respond to the street survey, the council regards them as being opposed to the application. The new policy recommends removing this and will base the outcome of the application solely on the responses which they receive.

I agree with the proposed change

In the proposed new policy, the Council will scrutinise each individual application that they receive. They can only accept 6 applications per month, and this would increase the time and money to be spent on each application.

I disagree with the proposed change

The council can use their discretion to end an application before it even reaches the stage of the street survey for a number of reasons. This shouldn't be used until residents have an opportunity to indicate their views, and no weight should be given to arguments which are rooted in blatant sectarianism

I want residents to have a chance to give their views

Signature

Date:

Go raibh mile maith agat!

AN DREAM  
DEARG

Polasaí sráidainmneacha Chomhairle Chathair Bhéal Feirste Comhairliúchán  
poiblí

Ainm: \_\_\_\_\_

Dáta Breithe: \_\_\_\_\_

Cód Poist: \_\_\_\_\_

Faoi láthair, más maith leat comhartha sráide dátheangach i do shráid, is gá duit dul doras go doras ar an tsráid agus ainmneacha a bhailiá 33% den tsráid chun tús a Chur leis an iarratas. Moltar sa pholasaí úr an clásal seo amach agus thig leatsa scríobh chuig an Chomhairle agus tús a chur leis an phróiseas tú féin. Tá seo i bhfad níos fusa dúinn!

Aontaím leis an athrú molta

Ag an bhomaite, déanfaidh an Chomhairle suirbhé sráide chun fáil amach cé atá i bhfabhar an chomhartha. Is gá don tsuirbhé tacaíocht a fháil 67% de chónaitheoirí sa tsráid. Moltar sa pholasaí úr tairseach tacaíochta níos forásaí de 15% ó na cónaitheoirí.

Aontaím leis an athrú molta

Sa pholasaí reatha, muna dtugann duine freagra ar an tsuirbhé, glacann an Chomhairle leis go bhfuil siad in éadan an iarratais! Moltar sa pholasaí úr an gné seo a bhaint agus bunófar an cinneadh ar na freagraí a bhailítear amháin.

Aontaím leis an athrú molta

Sa pholasaí úr, déanfaidh an Chomhairle grinnscrúdú ar gach aon iarratas a fhaigheann siad. Ni féidir leo glacadh ach le 6 hiarratas sa mhí agus chuirfeadh seo go mór leis an mhéid ama/airgid atá i gceist le gach iarratas,

Easaontaím leis an athrú molta

Is féidir leis an Chomhairle deireadh a chur leis an iarratas fiú sula mbaineann sé an suirbhé sráide amach ar chúiseanna éagsúla. Níor mhaith go ndéanann siad seo sula mbíonn an deis ag cónaitheoirí a mbarúlacha a chur in iúl, agus níor mhaith go dtugtar aon mheachán d'argóintí a bhfuil bunús seicteach leo.

Ba mhaith liom go mbíonn an deis ag cónaitheoirí a mbarúlacha a chur in iúl

Signature

:Date:

Go raibh míle maith agat!

AN DREAM DEARG

### **Appendix 3: Sinn Féin submission example**

#### **Proposed Dual Language Street Signs Policy**

Belfast City Council is currently undertaking a review of the Dual Language Street Signs Policy. We are seeking your views and feedback by participating in the survey below. You do not have to sign in or register on our Your Say Belfast platform to take part, however if you are a registered user, you must sign out of Your Say Belfast account so that your response is anonymous. Please be aware, that if you are signed into Your Say Belfast, your email and site registration details can be linked to this survey.

#### **Proposed changes to the policy**

##### **A. Proposed change to the method for applying for a dual language street sign**

###### **Current policy:**

The current policy requires an application to be submitted with a petition showing the support of not less than one third of the occupiers of the street in question.

###### **Proposed policy:**

The proposed policy states that only the following persons may apply: an occupier or occupiers of the street, an Elected Member representing the District Electoral Area where the street is located or a developer.

The proposed policy removes the requirement that an application must be submitted with a petition showing the support of not less than one third of the occupiers of the street in question.

1 To what extent do you agree or disagree with the proposed change? I Strongly agree

2 Please explain your answer, or if you would like to propose an alternative approach, please tell us here: Please add your comment here...

"I believe that the previous method through which bilingual signage could be applied for wasn't based upon bestpractice nor was it in keeping with International and European Agreements in relation to minority languages. Therefore, I would like to see the method changed to that which is being proposed."

##### **B. Proposed change to the threshold for further consideration of the application**

###### **Current policy:**

The current policy requires two thirds (67%) of the occupiers of the street to be in favour of the application for a dual language street sign. If that threshold is reached, a report is brought to committee to recommend approval of the application.

###### **Proposed policy:**

The proposed policy requires 15% of the occupiers of the street to be in favour of the application for a dual language street sign. If that threshold is reached, a report will be brought to committee to consider the application.



The threshold of 15% was adopted by the council after consideration of a number of factors, including UN Special Rapporteur guidelines, which recommend an approach that allows bilingual or trilingual signs where between 5 - 20 % of the local population speak the regional or minority language: OHCHR | Language Rights of Linguistic Minorities

It is important to note that the council has always had and will continue to have residual discretion to erect or not erect a dual language street sign based on various factors including the results of the survey of the street.

Please see the FAQs section for an explanation of residual discretion and background as to why this change in threshold is being proposed.

3 To what extent do you agree or disagree with the proposed change? |

Strongly agree

4 Please explain your answer, or if you would like to propose an alternative approach, please tell us here: Please add your comment here...

"The previous threshold was in itself undemocratic. In 2017, United Nations Special Rapporteur on minority issues published Language Rights of Linguistic Minorities: A Practical Guide for Implementation (2017). In relation to the threshold of multilingual signage, the UN proposed a threshold of between 5-20% as a best practice estimate for the inclusion of minority languages, The proposed policy clearly sets out a 15% threshold and therefore is in keeping with the UN's recommendations. The Framework Convention for National Minorities also commits Britain to endeavour "to display traditional local names, street names and other topographical indications intended for the public also in the minority language" in areas where there are speakers of minority languages and when taking into account the specific conditions of the language (Article 11(3)). I believe that the 67% threshold is too high and therefore in breach of this article."

C. Proposed change to clarify how responses to the survey are classified

Current policy:

In the current policy, if you do not respond to the survey, you are deemed not to be in favour of the application.

In practice, the committee receives a breakdown of all responses (and non-responses) to the survey for consideration.

Proposed policy:

The proposed policy removes the presumption that you are not in favour of the application if you do not return a survey, Only those indicating that they are not in favour of the application will be deemed to be so.

The committee will continue to receive a breakdown of all responses (and non-responses) to the survey for consideration.

5 To what extent do you agree or disagree with the proposed change? I Strongly agree

6 Please explain your answer, or if you would like to propose an alternative approach, please tell us here: Please add your comment here...

"Existing policies within councils across the north make no mention of the current Belfast policy in relation to the acceptance of a non-response as a vote against the erection of bilingual signage. Newry, Mounre and Down and Mid-Ulster councils employ some of the most progressive policies on bilingual signage in this region and their policies make no reference to this clause. I believe this is an undue barrier that has been placed before the erection of bilingual signage and would be in favour of its removal in the proposed policy".

D. Proposed change to assess each application for equality, good relations and rural needs implications

Current policy:

The current policy process does not require scrutiny of each application to identify and inform the council of any equality of opportunity, good relations or rural needs implications.

Proposed policy:

The new policy process will require an assessment of each application to identify and inform the council of any equality of opportunity, good relations or rural needs implications. This assessment will rely on the information submitted on the application form, local data and local knowledge as well as the survey results. This may lead to a more detailed assessment if necessary (a screening or an Equality Impact Assessment), Please see the FAQs for further explanation of this process.

7 To what extent do you agree or disagree with the proposed change? I Strongly agree

8 Do you have any comments about this change in policy to assess each application? Please add your comment here...

"I am in favour of the proposed change. The previous consultation on bilingual signage in Leisure Centres featured a similar question. "

E. Proposed change to explain the operation of the council's residual discretion

Current policy:

The council has always retained a discretion to depart from the policy.

Proposed policy:

The proposed policy provides further clarification on the factors that may be considered when the council exercises that discretion:

- the views of the occupiers of the street;

- the results of the assessment of each application to identify and inform the council of any equality of opportunity, good relations or rural needs implications;
- consideration of the local context of the application; - any other relevant council policies or strategies related to the application; and - all material considerations relating to the application.

9 If you have any comments on the factors that may be taken into account, please tell us here: Please add your comment here... I have nothing to Add

10 If you would like to comment on any aspect of the proposed policy that has not been addressed by the preceding questions, please respond here: Please add your comment here...

"This new policy would see Belfast City Council become a leader in the protection of minority language rights and an example to other councils which have weak or developing bilingual signage policies. This new proposed policy would also see Belfast City Council meet its obligations under - European Charter for Regional and Minority languages (Treaty no. 148)

- Framework Convention for National Minorities (Treaty no. 157)

Belfast has a burgeoning and blossoming Irish Language community and this policy, which will heighten and increase Irish Language visibility, will ensure that our council is one of the driving factors in that.

Cuireann an détheangachas go mor le hachan gné den tsaoil. Dar leis an Chairt Eorpach do mhionteangacha, is ionann féicealachtaí na teanga agus i a chur chun cinn. B'amhlaidh ann le comharthaíocht dhátheangach i mBéal Feirste."

Equality Impact Assessment (EQIA) and Rural Needs Impact Assessment

11 Do you have any comments on the draft EQIA? Please add your comment here... I have nothing to Add

12 Do you have any comments on the draft Rural Needs Impact Assessment? Please add your comment here... NO

13 Are you aware of any other equality of opportunity, good relations or rural needs issues that should be taken into account in relation to the proposed changes to the policy? No

Name

DEA:

## **Appendix 4: Example of submission submitted by Irish language groups**

### **Belfast City Council Street Names Consultation**

#### **Draft Submission – Conradh na Gaeilge**

This submission relates to the current Belfast City Council consultation on the proposed changes to the street names policy. Belfast City Council is asked to accept this document in its entirety as an official submission.

#### **Conradh na Gaeilge**

Conradh na Gaeilge is the democratic forum of the Irish language community and the

an organisation for the language throughout Ireland and around the world. The main aim of the organisation is to re-establish Irish as a normal language of Ireland.

Since its establishment on 31 July 1893 the members of Conradh na Gaeilge have been actively promoting the Irish in all aspects of life in the country, from legal and educational matters to the development of media and Irish language communications and services.

Conradh na Gaeilge has been selected by Foras na Gaeilge, the all-island body representing both Governments North and South to promote the Irish language, as one of the six lead organisations they have funded to develop the Irish language on the island of Ireland. Primarily, Conradh na Gaeilge has been selected to address language protection, representation and awareness raising for the Irish language.

Conradh na Gaeilge has 180 branches and many individual members, and all members of Conradh na Gaeilge work tirelessly to promote the use of Irish in its own areas. Further information on the work of Conradh na Gaeilge is available at [www.cnag.ie](http://www.cnag.ie)

Conradh na Gaeilge welcomes the update of Belfast City Council 's street names policy which is currently out for consultation. As has been set out in international standards and guidelines, a particular emphasis is placed on the importance of visibility, especially in the case of minority languages. It has been identified that the visibility of the language has a positive impact not only on the language community itself, but on the community as a whole; Comprehensive signage policies help to normalise the language and inform the language community that they are welcome to use their language. In addition, international research shows that tolerance increases, and that acceptance is furthered due to the frequency with which these minority languages are seen. Particular emphasis is also placed on the traditional use of the original version of placenames; It is estimated that 95 +% of placenames in the north come from the Irish language and this should be celebrated and promoted through a comprehensive and rights-based signage policy.

Despite all this, Belfast City Council 's current policy is extremely limited; in a compliance framework put together by Conradh na Gaeilge and CAJ in 2019, which is based on the duties of the Councils concerning the Irish language, the Council's street names policy came under criticism. It was recognised that there were areas within this policy which are counter to international recommendations and directives and place additional obstacles in the way of those residents who wish to erect a bilingual street sign. We therefore demand:

- That the 33% of residents to be collected in order to begin the process be removed. Demand for the bilingual street sign is assessed through the street survey, so this step is redundant and places additional, unnecessary responsibilities on the resident who has requested the signage.
- The preliminary assessment should be removed when applying for a bilingual street sign. All residents should have the democratic right to comment on the bilingual street sign and this step has the potential to infringe on that right by terminating the process before the street survey is completed. In addition, it is possible at this stage that weight be given to arguments. Councils should recognise this and put a stop to such arguments. Language belongs to everyone, regardless of location, demographic, or history of the area and this step is contrary to that.
- The support threshold should be reduced from 66% to 15%. While we welcome the reduction, we believe that the Council could be even more progressive; if COMEX, Council of Europe experts recommend between 5-

20%, the Council should work towards the most progressive part of that scale (5%).

- Only responses collected by the deadline stated in the street survey are considered. A resident's failure to respond to the street survey should not be considered as an objection. This was an excessive, unreasonable and unfounded aspect of the old policy.
- Not all applications received by the Council under the policy are scrutinised. EQIA will be carried out on the policy itself, so it is not necessary to do so with every application made under the policy. This is excessive and would add significantly to the amount of time and expense involved in each application, which is already restricted by the Council. This step has the potential to significantly delay all applications.

## **Context**

### **Equality and Section 75**

Given that the majority of Irish language users are, according to statistics, young people or those of Catholic or nationalist background, it is likely that any provision for the Irish language will have a clear and positive impact in terms of equality of opportunity on these groups. This policy may have a positive impact on equality of opportunity for Protestants, unionists, the elderly and ethnic minorities as these are groups that are unlikely to have had other opportunities to engage with the Irish language. (Census 2011). Provision for the Irish language in politically neutral environments, such as streets throughout the city, will increase this understanding.

An 'adverse effect' on equality of opportunity is something that is immediately or ultimately has an impact on a group or groups of people. To date, a policy that facilitates Irish language signage, which is in line with the recommendations of the ECRML, has never been shown to have an adverse effect on equality of opportunity.

Disputes surrounding the Irish language are often rooted in sectarianism, and this goes against Section 75 and other equality legislation. However, this is rarely mentioned in the equality assessments of Irish language policies.

### **Good Relations**

There have been many references to Belfast City Council's obligations concerning good relations within this policy. It is worth noting that the Equality Commission has updated its definition of 'good relations', which now states:

*"Promoting good relations between different groups in society is about fostering mutual respect, understanding and integration."*

The Irish language faces many obstacles as well as discrimination and intolerance. As a leading public institution, Belfast City Council should, in line with its own language policy, embark on a program that addresses discrimination and intolerance, which encompasses the provision of bilingual signage which, in turn, enhances visibility and normalisation. of Irish.

While we recognise that the issue of the Irish language has been mentioned in a number of political controversies over the use and promotion of the language, this new definition ensures that 'good relations' should not be used as a veto to anything involving political controversy. The origins of the opposition should be clear, and local authorities, including Belfast City Council, should not support a challenge based simply on sectarianism. This would be contrary to the provision of good relations and equality.

The oversight body for The Framework Convention for the Protection of National Minorities has stated that it is concerned about the way in which good relations have been misread in a way that restricts the protection of the Irish language. In 2011, their Third Opinion on the United Kingdom stated:

*"The Advisory Committee was disconcerted to hear that some representatives of the authorities consider that promoting the use of the Irish language is discriminating against persons belonging to the majority population. Such statements are not in line with the principles of the Framework Convention..."*

The Committee reiterates that the exercise of the rights of minorities protected under the Framework Convention is not "discrimination against others."

The Committee also stated that,

*"It is regrettable that measures to promote the visibility and use of this language have*

*often been opposed with the justification that they constitute a discrimination against other groups of the population." (para 21).*

The contracting body dealt directly with the use of the 'good relations' obligation to avoid positive action towards the Irish language. He specifically mentioned bilingual signs, in view of the specific cultural heritage obligations under the Framework Convention to promote placenames in their original language. In 2011, the Advisory Committee on the Framework Convention for National Minorities stated:

*"Advisory Committee has been informed that, in some instances, the need for keeping good relations has been used as justification for not implementing provisions in favour of persons belonging to minorities, such as the erection of bilingual signs...*

*Additionally, it finds it problematic that the official policy is to limit the erection of such signs to certain areas where the issue would not raise controversies. The Advisory Committee is concerned that this approach is not in line with the spirit of the Framework Convention... the aim of which is to value the use of minority*

*languages ... with a view to promoting more tolerance and intercultural dialogue in society."*

## **International Standards and Signage**

The European Charter for Regional or Minority Languages (the Charter) is an international convention aimed at protecting and promoting regional and minority languages as an endangered aspect of Europe's cultural heritage. For this reason, in addition to a non-discriminatory article on the use of these languages, there is provision for measures that actively support them.

The United Kingdom (UK) ratified the Charter in March 2001 and recognised obligations to protect and promote the Irish language, which has Part III status. Thirty-six articles on the Charter have been selected by the UK Government to ensure, as far as is reasonably practicable, that the Irish language is used in education and the media and to allow its use in judicial and administrative contexts, in economic and social life and in cultural activities.

The ECRML calls for the promotion of the Irish language through greater visibility in public places. Research has shown that increased visibility helps to normalise minority language, which in turn increases tolerance and understanding of that language. The use of bilingual signage provides a simple and natural way of facilitating access to the Irish language in a way that highlights a shared culture and history. Bilingual signage should, therefore, be available at a local level in areas where there is a clear demand; instead, applications are hampered by unreasonable steps contained within the actual process, as reflected in Belfast City Council's old policy.

Reports made by contracting bodies show that the obligations to promote and protect the development of the Irish language are not being met in accordance with international obligations - many of which have been referred to by Belfast City Council in the equality screening report of the consultation. Obligations in relation to the protection of the Irish language are enshrined in a number of different treaties made since the 1990s. These include: The International Covenant on Economic, Social and Cultural Rights; European Charter for Regional or Minority Languages;



Framework Convention for the Protection of National Minorities. Recommendations made within confirm support for an Irish Language Act and state in particular that any protection legislation for the Irish language must include bilingual signage.

### **Good Friday Agreement (1998)**

The Good Friday Agreement made the first ambitious commitments to the Irish language, including a promise to

- take resolute action to promote the language;
- facilitate and encourage the use of the language in speech and writing in public and private life where there is an appropriate demand;
- seek to remove, where possible, obstacles that would discourage or work against the maintenance or development of the language;
- make provision for liaising with the Irish language community, representing their views to public authorities and investigating complaints;
- encourage parties to secure agreement that this commitment will be sustained by a new Assembly in a way that takes account of the desires and sensitivities of the community.

According to the Council of Europe, it is a legal framework and a measure that represents a 'resolute action' for the Irish language, which is not yet in place. Without a clear law or framework that demonstrates how the Irish language should be dealt with, whether in service delivery or through signage, the promotion of the Irish language depends on political understanding, rather than legal definition. Increased visibility through bilingual street signage is an opportunity to express the Irish language in a non - political way.

The Good Friday Agreement also promised to seek to address obstacles that would harm, or constrict the development of the Irish language. Since then, instead of tackling obstacles, further barriers to the development and normalisation of the language, have been placed at local level especially regarding street signage. The original version of the placenames can encourage people to discover the linguistic origins of their area. Bilingual signage at local level should be available on demand; instead, policies for bilingual street signs rely on an unreasonable and excessive support threshold; the resident takes on additional responsibility and those who do not participate in the process are inaccurately classified.

### **St Andrews Agreement (2006)**

In the 2006 St Andrews Agreement the commitments given in the Good Friday Agreement were built upon under Strand Three 'Rights, Protections and Equality of Opportunity'. Under Annex B of the 2006 St Andrews Agreement, the British Government undertook to "introduce an Irish Language Act reflecting the experience of Wales and Ireland." Despite this commitment, an Irish Language Act has never

been passed, although there have been three consultation processes to date since 2006, in which the majority of respondents clearly supported statutory provision for the Irish language. In 2015, over 13,000 responses were received and 97.4% were in favour of an Irish Language Act.

### **Northern Ireland Act (1998)**

A second commitment was made in which the Northern Ireland Executive was placed under a statutory obligation to "adopt a strategy setting out how it intends to enhance and protect the development of the Irish language." On March 10, 2016, despite that and other commitments made in the 2011 Program for Government by the Executive, the Executive voted in favour of rejecting the recommendation submitted by the Minister in the Department of Culture, Arts and Leisure to adopt a strategy for the Irish language. On March 3, 2017, in a judicial review taken by Conradh na Gaeilge against the Executive, the High Court ruled that the Executive had failed to fulfil its statutory duty to implement a strategy for the Irish language.

### **Draft Strategy for the Enhancement and Protection of the Development of the Irish Language (DCAL) (2015)**

The Department of Culture, Arts and Leisure (DCAL) and the DCAL Minister published a draft 20-year Strategy to Enhance and Protect the Development of the Irish Language (2015-2035). This draft strategy recognises the importance of bilingual signage, and sets out the role that local Councils would play in honouring commitments under the ECRML, including a duty to,

- "facilitate the preservation and appropriate signage of Irish placenames and the naming of new housing developments in Irish" (p. 53)

### **Belfast City Council Language Strategy (2018)**

In 2018, Belfast City Council launched a Language Strategy (2018-2023) which aimed to respect and celebrate linguistic diversity within Belfast. Five languages are specifically mentioned under this policy, including Irish. The Strategy states that the needs of the Irish language community need to be met, and that the recommendation is to do this through;

- Normalising the visibility and use of the language in general.

It is clear that the Council's current policy on street names is contrary to the above aim.

### **New Decade New Approach (January 2020)**

The New Decade New Approach Agreement in January 2020 was the first agreement to officially recognise the Irish language in the north. As part of that agreement, a commitment was made for more provision for the Irish language. It was stated that this will be done through;

"Legislation to create a Commissioner to recognise, support, protect and enhance the development of the Irish language in Northern Ireland and to provide official recognition of the status of the Irish Language in Northern Ireland..."

It was stated within that Agreement that an Irish Language Commissioner would be appointed, and that he/she would have responsibility for drafting language standards, and distributing these standards to public authorities, according to their level of contact with the public. This is a practice in place in Wales, and experience shows that local councils are in the highest category (which means a high level of contact with the public).

Of course, street signage falls within the remit of local Councils; in the spirit of the New Era New Approach agreement, local councils should see progressive progress on street name policies. As such, Belfast City Council has the opportunity to be proactive, rather than reactive and at the forefront of its new street names policy.

### **Committee of Experts 5<sup>th</sup> Monitoring Report (July, 2020)**

In July 2020, as part of the Committee of Experts' 5th monitoring report on the implementation by the UK Government of the European Charter for the Irish Language, 20 recommendations were published to meet all the obligations in relation to the Irish language in the Charter. One of the recommendations was to:

*k. Facilitate the adoption and use, by local and regional authorities as well as public service providers, of place-names in Irish.*

### **Recommendations**

<b>Question 1: To what extent do you agree or disagree with the proposed change?</b>  Strongly agree	<b>Question 2: Explain your answer</b>  Residents who wish to have their street surveyed for Irish language signs should not be deterred. There was never any basis for the condition in the old policy regarding 1/3 of residents required to begin the process. I strongly agree with the proposed change.
<b>Question 3: To what extent do you agree or disagree with the proposed change?</b>  Strongly agree	<b>Question 4: Explain your answer</b>  The UN has recommended that the recommended threshold be between 5-20% and I believe the threshold should be selected at the bottom of the scale (i.e. 5%). I do not understand the reasoning behind choosing 15% among 5-20% scale. If the UN has recommended between 5-20%, it is

	worth pursuing the most progressive part of the scale.
<b>Question 5: To what extent do you agree or disagree with the proposed change?</b>  Strongly agree	<b>Question 6: Explain your answer</b>  The old policy was asinine and had no reasonable basis. Like local elections, only votes cast should be taken into account.
<b>Question 7: To what extent do you agree or disagree with the proposed change?</b>  Strongly disagree	<b>Question 8: Explain your answer</b>  The policy is generally equality screened. This policy is expected to have positive implications for good relations and no other equality implications. To this end, all applications covered by this policy should not be subject to equality screening if a decision has already been made on the equality implications of the policy itself. Also, it would be excessive and unreasonable to subject each application to a separate equality screening.  I strongly recommend that not all applications be scrutinised, especially by officials at the initial stage of the process before the application reaches the survey stage. I do not believe there is any basis for any decision taken to block an application to go as far as a local survey. I believe that it would be a breach of the legislation (1995) to deny residents the democratic right by cancelling applications due to 'equality' or other screening prior to this stage of the process. All applications should be considered in the first instance based on a breakdown of responses. It is not clear to me that local authorities have any other practice or example in which such requests could be overturned through an unclear 'equality' process or other indicators. To that end, this is merely a further impediment to the unfounded process, which could lead to the

	cancellation of legitimate applications at the discretion of an official. This recommendation is not in line with best practice for equality for minorities.
<p><b>Question 9- Any other comments?</b></p> <p>The residual discretion of the council is left to the council or a committee of the Council at the final stage of the process only. Residual discretion of the council should not be allowed before residents have an opportunity to comment on the application as clearly set out in law. The council has a legal duty to seek the views of residents when all applications are received.</p> <p>The residual discretion of the council should not infringe on their international obligations regarding language rights or the protection of minorities. Any opposition to that application/language rooted in sectarianism or discrimination should be immediately ruled out.</p>	<p><b>Question 10 – Any other comments?</b></p> <p>The EQIA documents published with this consultation specifically state that bilingual signage is a neutral act in relation to the Irish language, an action which is in line with political agreements and international instruments and instruments ratified by the UK Government and recommended by the Department. Communal. Additional evidence from the UN, CAJ and Conradh na Gaeilge shows that increasing the visibility of local minority languages contributes significantly to the normalisation of that minority language and thereby increases tolerance, empathy and understanding of diversity and languages in general. It is strongly recommended that all international obligations regarding language rights and minority protection be fully implemented as they fall within the scope of this advice.</p>
<p><b>Question 11: Do you have any comments on the draft EIA?</b></p> <p>The main purpose of the Section 75 statutory equality duty is to better promote the ‘adverse impact’ on equality and equality alone, as evidenced by nine different characteristics. Political opposition or disputes against a particular policy should not be misunderstood as ‘adverse effects.’ Similarly, it would be contrary to the very reason for this duty in itself for arguments rooted in prejudice or intolerance (including sectarian bias) against minority languages to influence policy due to the Section 75 process. As well as this, there is no guidance on how the Council would approach such evidence. To that end, I do not think that a policy that promotes and facilitates bilingual signage under Section 75 would have any adverse effect and yet, if it did, restricting linguistic diversity would not solve the problem; the Council should take further action to combat intolerance and promote understanding.</p>	

However, at present, the 'good relations' section of the EQIA refers to previous consultations, referring to the 'concerns' from those 'who do not support languages other than English,' and talks about putting local protections in place to deal with these concerns. The need for 'community support', and the reference of bilingual signs without 'significant opposition' would provide a veto which would be contrary to the purpose of the obligations under Section 75 itself and minority rights in general. It would also risk contributing to institutionalisation bias in policy-making. I would call for these sections of the draft EQIA and the policy itself to be reconsidered and removed from these providers to ensure that the policy and outcomes of the EQIA are consistent with the types of action that would make the good relations duties authoritative. Indeed, the Council's own equality scheme defines good relations as seeking to promote respect and 'accept diversity of all kinds' - in contrast, the purpose of the good relations measure mentioned in the draft EQIA is to embed a veto against linguistic diversity for those 'who do not support languages other than English.'

The Council's decision to scrutinise all decisions taken to erect a bilingual street sign would be a significant change for the Council from the normal implementation of the equality scheme. If this is a new approach from the Council, its implementation would have operational implications, for example, in all, or any, other building control applications. I ask why this approach has been applied to something that is primarily concerned with the Irish language, and if the Council has a similar process in place elsewhere, in which all applications are scrutinised?

I welcome the inclusion, in the draft EQIA, of material that refers to international standards, as they relate to minority rights, the ECRML and the FCNM. The references to the Charter could be changed to obligations under Section 7 and the specific reference to the promotion and use of Irish placenames in Section 10 (2) (g), as they relate directly to street signage. I would also urge the Council to outline and incorporate these responsibilities into the circumstances that the Council will consider in reaching a decision.

**Question 12: Do you have any comments on the draft Rural Needs Assessment?**

**N / A**

**Question 13: Are you aware of any other issues relating to equality of opportunity, good relations or rural need that should be considered in relation to the proposed policy changes?**

**It is known**

**Question 14: Explain your answer**

Reference is made to the duty of good relations in relation to this policy. It is important to note that the Equality Commission has updated its definition of good relations. They now suggest that "the promotion of good relations in society is about fostering mutual respect, understanding and integration, while tackling discrimination and intolerance." The Irish language faces many obstacles and yet, Irish speakers suffer from discrimination and intolerance. As a key public institution, Belfast City Council should adopt this policy which addresses some of this discrimination and intolerance, and which takes progressive steps towards the visibility and normalisation of the Irish language through bilingual signage. As referenced in the EQIA, the use of minority languages in signage has a positive impact on community relations and mutual respect.

**Universal Declaration of Human Rights; Article 2**

*Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.*

**Céard É An Scéal? 2020**

46% in the north believe that bilingual signage should be erected to raise awareness of our shared heritage (only 30% opposed it) according to an independent survey conducted by Kantar in 2020.

**Best practice in other councils' street name policies****Mid-Ulster**

<https://www.midulstercouncil.org/resident/building-control/street-naming/street-naming-and-dual-language-signage-policy>

- *A valid petition or letter, signed by occupiers of the street must be made to Council to enable this matter to be considered.*
- *The Environment Committee will receive notification of submitted requests by way of valid petition as referenced at 1, above. A petition will be deemed to be valid where it is completed by a minimum of one householder on that street.*

*Approval will be sought from the Environment Committee to undertake the survey.*

- *Upon agreement, the Council will canvass, by post, all occupiers listed on the Electoral Register and the Pointer addressing system of that street; seeking their views on the request to erect a dual-language street nameplate. Each letter will contain survey forms for the number of occupiers registered on the Electoral Register for that property at that time.*
- *The occupiers will be advised of the date by which completed surveys must be returned. Incomplete or illegible survey returns will not be counted. Completed surveys must be returned in the self-addressed envelopes provided for that purpose. Only replies received by the specified date shall be considered.*
- *For purposes of assessment where 51 % (rounded to nearest whole number) of the occupiers that respond indicate that they are in favour of the erection of a dual language street nameplate, then this shall be presented to the Environment Committee for decision recommending that the dual language street nameplate be approved and erected. The Environment Committee having considered the request and the result of the survey may agree to permit or not permit the erection of the dual language nameplate.*

## **An tIúr, Múrn agus an Dún**

<https://www.newrymournedown.org/postal-numbering-and-street-nameplates>

- *In line with the Council's Bilingualism Policy, the Council will promote the inclusion of the Irish language in street nameplates while having regard of any views on the matter expressed by occupiers of the street.*
- *A resident of any street may request in writing a dual language nameplate for that street. Any request must be submitted to the Council's Licensing Section.*
- *An elected member can submit a request for a dual language nameplate on behalf of residents in their electoral area. Elected members shall provide the name and address of the resident(s) who they are submitting the request on behalf of.*

[https://www.newrymournedown.org/media/uploads/development\\_naming\\_postal\\_numbering\\_and\\_erection\\_of\\_nameplates\\_policy\\_and\\_procedures.pdf](https://www.newrymournedown.org/media/uploads/development_naming_postal_numbering_and_erection_of_nameplates_policy_and_procedures.pdf)

**6.4.4** *Where a dual-language street nameplate is to be erected, only the traditional*

*and correct forms of the place-name shall be used.*

**6.4.5** *Where a simple majority of responding residents have indicated that*



*they are in favour of the erection of a dual -language street nameplate, then the*

*proposal will be presented to the Director of the Regulatory and Technical Services Department for consideration recommending that the dual-language street nameplate is erected. The Director having considered the request may agree to permit or not permit the erection of the nameplate.*

**6.4.6** *The local townland name shall be placed at the bottom of all new nameplates.*

*Single language townland names shall be provided on single language nameplates and dual-language townland names shall be placed on all new dual language nameplates.*

### **Derry and Strabane**

The same approach to Belfast City Council's proposed policy changes has indeed been agreed by Councillors in Derry and Strabane City Council. In January last year, Derry and Strabane City Council Councillors voted to lower the support threshold for bilingual street signs from 66% of residents to 15%.

It is a significant step for Belfast City Council to look at the policy of Derry City Council and Strabane, as setting out a clear example of good practice, but there is still a significant difference between Derry City Council's policy and what is proposed. under Belfast City Council;

- while Derry and Strabane Council have a residual discretion, we do not see it as proposed under that Council's policy that this discretion be allowed to be exercised at the beginning of the process (ie before residents have the opportunity to comment indicated in the street survey) as proposed under Belfast City Council's new policy.
- The current policy of Derry and Strabane City Council also states that there is no limit to the number of applications that the Council can accept, which is specified in Belfast City Council's policy.

Therefore, while it is positive that Belfast City Council is looking to those councils that are adhering to best practice, all aspects of this good practice should be identified and this example followed with all aspects. of the policy.

### **Fear Manach agus na hÓmaí (Fermanagh and Omagh)**

<https://www.fermanaghomagh.com/app/uploads/2021/07/210709RevisedStreetNamingAndNumberingPolicy.pdf>

*2.3 An application for the erection of a street sign in a language other than English may be made by an ‘Applicant’ which for purposes of this policy means:*

*(a) an Occupier or Occupiers of the street for which the application is made, or*

*(b) an Elected Member of Fermanagh and Omagh District Council who represents the District Electoral Area in which the street is located.*

*2.4 When an application is received, the Council will canvass by post all Occupiers of that street and seek their views on the request to erect a street sign in a second specified language. Replies must be returned by the date specified in the correspondence. Only those replies received from the occupiers by that date will be considered.*

*2.6 Where fifteen percent or more of the Occupiers of that street have indicated*

*that they are in favour of the erection of a second language street sign, then such a sign may be erected, subject to the residual discretion and protections/mitigations as specified in 2.8.*

### **Guidance from Wales**

**Bilingual Cardiff 2017-2022**

<https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Bilingual-Cardiff/Documents/Bilingual%20Cardiff%20Strategy.pdf>

***“Increase the visibility of the Welsh language within the city to reflect a ‘Bilingual Cardiff’ through existing planning mechanisms.”***

- *Investigate and where appropriate identify planning mechanisms to ensure that planning applications for large developments such as chain stores, supermarkets and retail consider the need to display bilingual signage and notices.*
- *Investigate and where appropriate identify planning mechanisms to ensure that planning applications for new housing developments consider the need to adopt Welsh or bilingual names, displaying bilingual signage and notices.*

### **Guidance from Scotland**

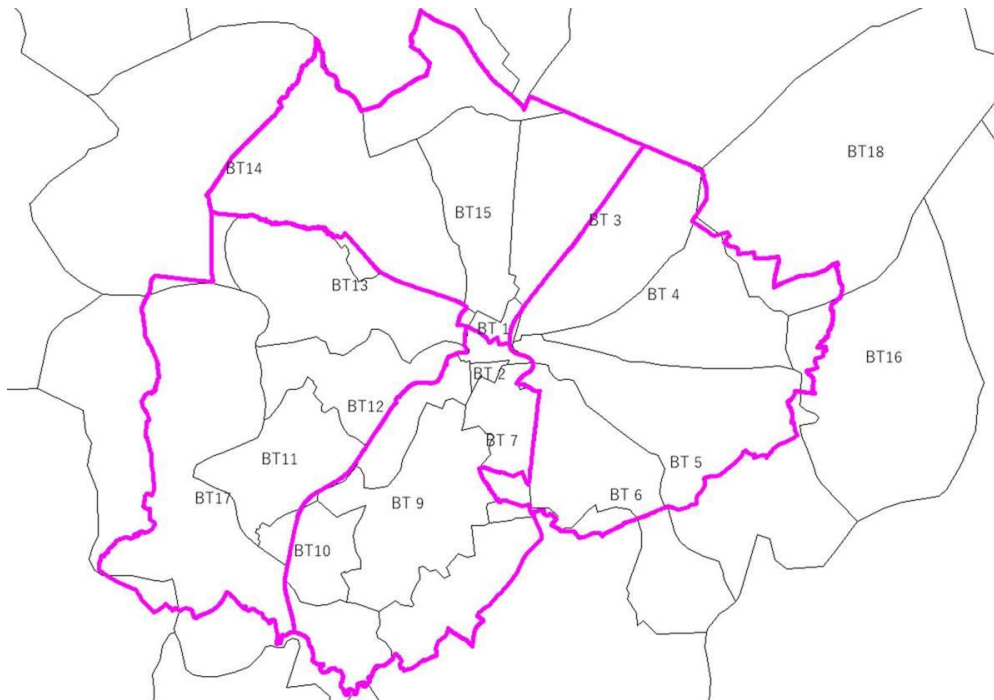
#### **The Scottish Governments Gaelic Language Plan 2016-2021**

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/05/scottish-government-gaelic-language-plan-2016-2021/documents/00517453-pdf/00517453-pdf/govscot%3Adocument/00517453.pdf>

- *We will continue to work to increase the public profile of Gaelic through bilingual signage policies on a new or replacement basis following the principle of equal respect for Gaelic and English.*

## Appendix 5: Belfast Postcode Map

### Postcodes and NSEW proxy



Link to an online interactive map for NI postcodes. [Northern Ireland postcode geographies](#)

YSB Tags:	Main Classification*	Secondary tagging
BT1	City centre	N&S inner
BT2	S	City centre
BT3	E	Mostly Lisburn & Castlereagh
BT4	E	
BT5	E	
BT6	E	
BT7	S	
BT8	S	
BT9	S	
BT10	S	
BT11	W	
BT12	W	SW (S – Village area and Sandy Row)

BT13	W	
BT14	N	
BT15	N	
BT16	E	Mostly Lisburn & Castlereagh
BT17	W	SW (S - lower Dunmurry area)

\*main classification based on where majority of BT sits.