

BCC Draft Response to DfI Resource Budget 2023 – 24 EQIA.

Link to DfI Consultation:

[Budget 2023-24 Equality Impact Assessment](#)

Draft BCC Responses

Overarching points BCC would like to raise/ emphasise in covering letter to consultation response:

Belfast City Council is not in support of any of the measures that have been proposed in the Department's Resource Budget 2023-24 to mitigate the funding gap. The Belfast Agenda, our city's first community plan, sets out how multiple statutory, community and third sector partners have committed to making Belfast a safe, fair and inclusive place for all. In our view the proposed cost-saving measures run contrary to The Belfast Agenda since they will compromise the safety of all who live in, visit or use the city and especially the most vulnerable and those who experience the highest levels of economic and social deprivation.

A reduction in public transport provision:

The Council's Air Quality Action Plan (AQAP) is aimed at reducing air polluting emissions (NO₂, PM₁₀ and PM_{2.5}) associated with road transportation, by promoting the use of sustainable transportation options such as cycling and encouraging a shift towards greater use of public transport which reduces vehicle usage across the road network. DfI is a key partner in delivering that AQAP together with Translink. Therefore, any proposed reduction in public transport provision is concerning as there will be less choice for commuters who will not be encouraged to switch from their vehicles to using public transport. Therefore, any reduction in service provision may lead to an increase in vehicles on our road infrastructure which will in turn contribute to increased traffic congestion and air pollution in the city. This will impact on the successful delivery of the AQAP and the Council, together with its key partners DfI and Translink, will not be able to deliver on its key objectives for improving air quality standards in the city.

Furthermore, this will have a disproportionate impact on those already facing the highest levels of social inequality and economic deprivation, as they are less likely to own a private car or have access to private transport and are therefore more reliant on public transport to reach their place of work, or to access other social infrastructure of services including schools, nurseries, GP surgeries, leisure centres etc.

We are actively encouraging staff to use public transport and have seen an increase in the number of staff returning to the office following the pandemic. Will any reduction in public transport provision be designed to minimise the impact around the times when most of the workforce would be travelling to and from work?

Water and wastewater services impacted:

Maintenance of our sewerage system is an essential element in controlling the impact of the rat population on residential and commercial premises. Will the impact on rodent control be considered if waste and wastewater services are impacted?

The city is in need of investment within its wastewater capacity to deliver development, employment and housing. Currently there are some 11,000 people in housing stress within the Belfast area and any reduction in water and wastewater provision will directly impact those in greatest need of housing relief. In addition to this any further delay in delivering on the Living With Water Programme will have a direct impact on the provision of employment opportunities, reducing our ability to provide inclusive growth and to reduce the barriers to employment.

No road gritting service is provided this winter:

A reduction in road gritting services will also directly impact the most vulnerable in our society, increasing the risk of injury through slips and falls and potentially creating greater isolation of the elderly and mobility impaired.

Increased accidents will lead to congestion on our road network, directly impact public transportation provision and access to services across our community but particularly to the Section 75 groups who rely on these services most.

Our frontline services are required to travel to all locations within the council boundary throughout the winter. If no road gritting was undertaken there would be parts of the city that we may not be able to provide our dog warden, pest control, animal welfare and enforcement services to, as well other frontline services. Significantly, it would negatively impact our ability to collect waste, a statutory duty. If a decision is made not to grit roads, will it take account of the impact on Council frontline services?

Road maintenance and flood risk management operational activities are reduced to emergency-only services:

Maintenance of flood risk management operational activities are vital to reduce the likelihood and severity of flooding in Belfast which is an Area of Significant Flood Risk. Existing infrastructure requires investment and improvement as outlined in the Living With Water Programme (LWWP). Maintenance of the existing infrastructure is vital to reduce impacts from flooding, any reduction in routine maintenance such a grill and gulley clearance will have a detrimental impact increasing the likelihood of flood damage to homes and businesses with large clean-up costs and resource implications for statutory agencies.

Community transport is not funded:

Loneliness and isolation persists especially among the older and less mobile cohorts in society and therefore the provision of community transport is a lifeline. While we appreciate there are a number of factors that have combined to impact on the sustainability of this service, not least changes to work patterns, increasing costs of fuel etc. the termination of this service will be most keenly felt in the most poorly connected communities especially where a regular bus service is absent.

Streetlights are switched off:

Streetlights are vital to protecting the safety of all road users and pedestrians and the proposed switch off would threaten the safety and security of everyone, especially the most vulnerable including children and older adults, people with visual impairments or reduced mobility, and women.

Furthermore, those most likely to be impacted by the proposed measure are people who walk, run or cycle short journeys and therefore this will only serve to reduce the inclination towards active and sustainable travel modes. The highest level of conflict between the myriad road users and pedestrians is at peak commuting times of the day and therefore as a safeguarding measure it will be critical to guarantee the operation of streetlights during peak travel times.

Active School Travel programme:

Deciding not to fund the Active School Travel programme from July 2023 is likely to discriminate against young people and people with dependants. Taking a view via Sustrans, one of the partners on the Air Quality Steering Board we concur with the view that cutting this programme will contribute only 0.2% of the departments' budgetary shortfall and the impact on children across Northern Ireland will be greater. Consider the fact that climate change will have the biggest effect on the younger generation and the Department for Infrastructure has a legal obligation to reduce carbon emissions including investing 10% of the transport budget on active travel (it currently invests just 2%). There are many future implications of failing to encourage active travel from a young age, further entrenching car dependency and inactivity.

Furthermore, given the timeframes associated with this Budget Consultation this draft response has not yet been subject to our formal governance oversight and should be treated as draft pending formal ratification at the next meeting of the Full Council on the 3rd July 2023.

Specific points from EQIA that BCC departments would like to respond to:

Dfi Budget 2023-24	Draft Departmental Response
1. Are there any data needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 5 and 6 of the EQIA consultation document? If so, what are they? Please provide details?	Not to our knowledge however it will be critically important to undertake comprehensive stakeholder engagement especially targeted at the Section 75 equality categories.
2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 6 of the EQIA Consultation document? If so, what are they?	Yes. It is our view that all of the Section 75 equality groups will be adversely impacted to a varying but nonetheless high degree of adversity by the proposed budget savings. While there may be a lack of available datasets to determine the level of impact on specific protected characteristics it will be important to undertake comprehensive stakeholder engagement with Section 75 equality groups to ascertain how the proposed measures are likely to impact them.

	<p>It is our view that the proposed cuts represent a neglect of duty to have due regard for the need to promote equality of opportunity within and between the respective protected characteristics. We believe a number of the proposed budget saving measures will be especially harmful on the basis of gender and age including the proposed switch off of street lighting. It is clear that personal crime and physical assault persists especially along gender lines and it has long been reported that women in particular feel unsafe going out at night. This measure will serve to further reduce the inclination of women to make journeys on foot and instead choose to travel by private car.</p> <p>Our position is that, when evaluating savings options, the emphasis needs to be on protecting the needs of the most vulnerable in our society and seeking to maintain the services that they rely upon.</p>
<p>3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in seeking to manage the Department's resource budget?</p>	<p>It is our view that the Department needs to consider more carefully and thoroughly areas where resource budget savings can be made that will have reduced impact on the most vulnerable in society and avoid 'quick fix' measures such as the Active Schools budget saving which are short-sighted, run contrary to policy designed to encourage and facilitate more sustainable travel and improve mental and physical health outcomes.</p> <p>Our position is that the Department must seek to retain the services, to an adequate standard, that the most vulnerable in our society rely upon.</p>
<p>4. Are there any other comments you would like to make in regard to the consultation process generally?</p>	<p>The areas of savings identified throughout the consultation report appear to be unfairly targeted at some of the most vulnerable groupings. We would encourage minimal impact economically on those most vulnerable in society given the cost-of-living crisis and ongoing economic uncertainty.</p>