



Belfast
City Council

Equality Screening Template

Purpose Built Managed Student Accommodation
(PBMSA) in Belfast, Supplementary Planning Guidance
(SPG)

February 2016

Equality Screening Template

The Council has a statutory duty to screen. This includes our strategies, plans, policies, legislative developments; and new ways of working such as the introduction, change or end of an existing service, grant funding arrangement or facility. This screening template is designed to help departments consider the likely equality impacts of their proposed decisions on different groups of customers, service users, staff and visitors.

Before carrying out an equality screening exercise it is important that you have received the necessary training first. To find out about the training needed or any other queries on screening, contact the Equality and Diversity Officers (job-share) Stella Gilmartin or Lorraine Dennis on extension 6026/7 or by email equality@belfastcity.gov.uk

The accompanying **Screening Guidance** note provides straightforward advice on how to carry out equality screening exercises. Detailed information about the Section 75 equality duties and what they mean in practice is available on the Equality Commission's website¹.

The screening template has 4 sections to complete. These are:

Section A - provides details about the policy / decision that is being screened

Section B – gives information on the consultation process, supporting evidence gathered and has 4 key questions outlining the likely impacts on all equality groups.

Section C - has 4 key questions in relation to obligations under the Disability Discrimination Order

Section D - is the formal record of the screening decision.

¹ <http://www.equalityni.org/archive/pdf/S75GuideforPublicAuthoritiesApril2010.pdf>

Section A

Details about the policy / decision to be screened

1. Title of policy / decision to be screened:-

Purpose Built Managed Student Accommodation (PBMSA) in Belfast, Supplementary Planning Guidance (SPG)

2. Brief description of policy / decision to be screened:-

(Explain - Is this a new, revised or existing policy? Are there financial / legislative / procurement implications?)

The SPG has been prepared to provide additional advice and guidance in relation to PBMSA developments in Belfast. It supports and clarifies existing policies, most notably the Houses in Multiple Occupation (HMOs) Subject Plan for Belfast, the Belfast Metropolitan Area Plan (BMAP), the Strategic Planning Policy Statement (SPPS) for NI and PPS7 Quality Residential Environments.

It sets out supplementary guidance in relation to six planning issues, including:

1. **Location:** The development should be at a location which is easily accessible to university/college campuses by sustainable transport modes.
2. **Quality Design:** The layout, design and facilities provided within a development should be of high standards.
3. **Scale and Impact:** The development should be designed in a way that does not conflict with adjacent properties or the general amenity of the surrounding area.
4. **Management:** The development has appropriate management in place to create a positive and safe living environment for students whilst minimising any potential negative impacts from occupants.
5. **Need:** The development meets an identified need for the type of accommodation proposed. This should help secure a supply of accommodation in response to evidence of need.
6. **Planning Agreements:** Planning Agreements, and related developer contributions, may be required in relation to PBMSA where what is secured cannot be adequately addressed by the imposition of conditions alone.

3. Aims and objectives of the policy / decision to be screened:-

(What is the policy trying to achieve?)

To provide additional advice and guidance for use by developers, the public and by planning officers in the assessment of planning applications for PBMSA developments.

4. On whom will the policy / decision impact?

Consider the internal and external impacts (both actual or potential) and explain:-

Staff YES/NO

Service users YES/NO

Other public sector organizations YES/NO

Voluntary / community groups / trade unions YES/NO

Others, please specify YES/NO

For use by the public, developers and their agents when preparing planning applications for PBMSA in Belfast. Will also form a material consideration, to be referenced by development management staff when assessing planning applications for PBMSA developments.

5. Are there linkages to other Agencies/ Departments?

Polices supplemented by the SPG were originally prepared by the Department for Environment's Planning Service prior to the transfer of planning to the Council on 1 April 2015.

Section B

Information on the consultation process, supporting evidence gathered and has 4 key questions outlining the likely impacts for equality and good relations

6. Outline consultation process planned or achieved

A public consultation period will run for 12 weeks from 7 March 2016 until 30 May 2016. This will be conducted in line with corporate consultation policy and Statement of Community Involvement.

7. Available evidence

What evidence / information (both qualitative and quantitative) have you gathered to inform this policy? Set out all evidence below to help inform your screening assessment.

It is important to record information gathered from a variety of sources such as: monitoring information; complaints; research surveys; consultation exercises from other public authorities.

As outlined above, the SPG does not introduce any new policy, but instead supports and clarifies existing policies, most notably the HMOs Subject Plan for Belfast, the Belfast Metropolitan Area Plan (BMAP), the Strategic Planning Policy Statement (SPPS) for NI and Planning Policy Statement (PPS) 7: Quality Residential Environments. The principle evidence used to inform this equality screening exercise is therefore any equality screening and/or Equality Impact Assessments (EqIA) conducted in relation to these existing policy documents. The implications of these exercises are summarized briefly below.

HMOs Subject Plan

A full EqIA for the HMOs Subject Plan was published in December 2008. On the basis of an earlier screening exercise, the assessment concluded that the following Section 75 groups were affected by certain policy groupings and should be the subject of the fuller EqIA:

- Racial Group; and
- Age

However, from a review of the EqIA, most of the issues identified relation to HMOs policies as opposed to the PBMSA-specific policy, HMO7. As PBMSA is distinct from HMOs, the EqIA considerations for HMOs are not relevant when considering guidance specifically in relation to PBMSA. In relation to the Policy HMO7, the assessment concluded:

- There will be a positive impact on people from different religious groups or of different political opinion as provision of such accommodation will encourage higher standards of student accommodation and provide choice outside of residential areas where HMOs are concentrated.

- There will be a positive impact on people of different age and racial minorities. Belfast is under-represented in terms of purpose built student accommodation. This policy encourages such development hence providing more opportunity and choice for students and freeing up HMO accommodation for other sections of community such as migrant workers.

See Appendix A for further information.

BMAP

A full EqIA on BMAP was published alongside final Policy in September 2014. Whilst the majority of the high level, strategic policies contained within the EqIA are of no direct relevance to the PBMSA SPG, a number of relevant conclusions are recorded in relation to:

- **Housing Policies HOU3 and HOU4** – Sufficient flexibility exists to meet specific identified needs through design and house type. There is no evidence to suggest that the locational range of people with disabilities is inconsistent with the spread of opportunity for housing.
- **Urban Environment Policies** – Will have a positive impact on people of different religions and political opinions as distribution of zonings correlates with population distributions.
- **Open Space, Sport & Outdoor Recreation** – There is a potentially negative impact on young people and disabled people if these facilities are not accessible via public transport provision.

SPPS

A final Equality Screening report was published with final SPPS in September 2015. Again, as a high level strategic policy statement, there are no policies of direct relevance to the PBMSA SPG. However, the screening report notes that the SPPS, and the planning system generally, is for securing the orderly and consistent development of land in Northern Ireland under a reformed two-tier planning system.” It therefore concludes that “it will be applied uniformly across all section 75 categories without prejudice” and, as such, “will not positively or negatively discriminate towards any” Section 75 Group. It is, in fact, “expected to equally benefit all Section 75 categories”.

Other Relevant Planning Policies

Although not the principal policies of relevance to the provision of PBMSA, there are also a range of other regional policy documents and guidance that are referred to within the SPG. Each of these documents have also been prepared to by public bodies in accordance with any statutory obligations in relation to Equality Impact at the time of writing.

The Equality Screening for the SPPS highlights similarities between the SPPS and the existing suite of PPSs, noting that as high level, strategic policies there are no likely adverse impacts anticipated on equality of opportunity as the PPS, as with the SPPS, “will be applied uniformly across all section 75 categories.”

These other relevant policy documents are listed below, alongside any relevant learning from their respective equality assessment considerations:

- **Regional Development Strategy 2035 (March 2012)** – This high level strategic policy was subjected to a full EqlA, which is available on the Department for Regional Development’s (DRD) website. It concludes that “the implementation of the Strategic Guidance would provide benefits across all equality categories”, with “no negative effects on any category”.
- **PPS7: Quality Residential Environments (June 2001)** – There is no EqlA or Equality Screening Assessment publicly available in relation to this PPS.
- **PPS8: Open Space, Sport and Outdoor Recreation (February 2004)** – PPS8 was subject to an Equality Impact Screening exercise with the outcome indicating that “the PPS is unlikely to have any significant adverse implications for equality of opportunity or community relations.”
- **PPS12: Housing in Settlements (June 2005)** – The PPS notes that it has been prepared in accordance with DRD’s statutory obligations under Section 75 of the Northern Ireland Act 1998. This relies upon the original EqlA undertaken in relation to the first RDS (September 2001).
- **Creating Places (May 2000)** – This regional Supplementary Planning Guidance was prepared to support the published policies contained within PPS7 (see above). There is no EqlA or Equality Screening Assessment publicly available in relation to this guidance.
- **Living Places (September 2014)** – This provides strategic guidance to supplement a range of existing regional policy documents, including the SPPS (see above) and PPSs. There is no EqlA or Equality Screening Assessment publicly available in relation to this guidance.

8. What is the likely impact (indicate if the policy impact is positive or negative) on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? What is the level of impact?

Section 75 category	Likely impact?	Level of impact? Minor/Major/None
Religious belief	HMOs Subject Plan EqlA notes potential positive impact on people from different religious groups as provision of such accommodation will encourage higher standards of student accommodation and provide choice outside of residential areas where HMOs are concentrated.	Minor Positive
Political opinion	HMOs Subject Plan EqlA notes potential positive impact on people of different political opinion as provision of such accommodation will encourage higher standards of student accommodation and provide choice outside of residential areas where HMOs are concentrated.	Minor Positive

Section 75 category	Likely impact?	Level of impact? Minor/Major/None
Racial group	HMOs Subject Plan EqIA notes potential positive impact on people of different racial minorities. Belfast is under-represented in terms of purpose built student accommodation. This policy encourages such development hence providing more opportunity and choice for students and freeing up HMO accommodation for other sections of community such as migrant workers.	Minor Positive
Age	<p>HMOs Subject Plan EqIA notes potential positive impact on people of different age. Belfast is under-represented in terms of purpose built student accommodation. This policy encourages such development hence providing more opportunity and choice for students and freeing up HMO accommodation for other sections of community such as migrant workers.</p> <p>The BMAP EqIA notes in relation to open space that there is a risk of potentially negative impacts on young people if facilities are not accessible via public transport provision. The SPG seeks to promote highly accessible City Centre locations for PBMSA and will ensure adequate provision of open space located to serve any proposed developments. There is therefore no negative impact.</p>	<p>Minor Positive</p> <p>None</p>
Marital status	The BMAP EqIA notes in relation to general housing policies that sufficient flexibility exists to meet specific identified needs through design and house type.	None
Sexual orientation	There are no specific aspects of the PBMSA SPG that will have an impact on the promotion of equality of opportunity for people of different sexual orientation.	None
Men and women generally	There are no specific aspects of the PBMSA SPG that will have an impact on the promotion of equality of opportunity between men and women generally.	None
Disability	The BMAP EqIA notes in relation to general housing policies that sufficient flexibility exists to meet specific identified needs through design and house type. There is no evidence to suggest that the locational range of people with disabilities is inconsistent with the spread of opportunity for housing.	None

Section 75 category	Likely impact?	Level of impact? Minor/Major/None
	<p>The BMAP EqIA notes in relation to open space that there is a risk of potentially negative impacts on disabled people if facilities are not accessible via public transport provision. The SPG seeks to promote highly accessible City Centre locations for PBMSA and will ensure adequate provision of open space located to serve any proposed developments. There is therefore no negative impact.</p>	None
Dependants	<p>The BMAP EqIA notes in relation to general housing policies that sufficient flexibility exists to meet specific identified needs through design and house type.</p> <p>Increasing the provision of good quality PBMSA in the right locations, has the potential to free up larger units within general housing stock for conversion back from HMOs to houses suitable for family occupation, which could provide direct benefits to dependants.</p>	<p>None</p> <p>Minor Positive</p>

9. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?

Section 75 category	If Yes, provide details	If No, provide reasons
Religious belief		The SPG supplements existing policy and as such will not introduce any impacts in relation to any of these s75 categories, beyond those already identified in relation to the existing planning policies.
Political opinion		
Racial group		
Age		
Marital status		
Sexual orientation		
Men and women generally		
Dependants		
Disability	Although not of direct relevance to the SPG, all development must be Disability Discrimination Act (DDA) compliant. There is therefore an opportunity for the SPG to actively promote compliance with these requirements by highlighting the need for rooms within PBMSA development to be suitable for students with disabilities.	

10. To what extent is the policy likely to impact (positive or negatively) on good relations between people of different religious belief, political opinion or racial group? What is the level of impact?

Good relations category	Likely impact?	Level of impact? Minor/Major/None
Religious belief	The PBMSA SPG does not include any specific proposals that would either promote or detract from good relations.	None
Political opinion		
Racial group		

11. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good relations category	If Yes, provide details	If No, provide reasons
Religious belief	The PBMSA SPG offers no specific opportunities to promote good relations between people of different religious beliefs, political opinion or racial group.	None
Political opinion		
Racial group		

Section C

Belfast City Council also has legislative obligations to meet under the **Disability Discrimination Order** and Questions 12-13 relate to these two areas.

Consideration of Disability Duties

12. Does this proposed policy / decision provide an opportunity for the Council to better promote positive attitudes towards disabled people?

Explain your assessment in full

There is therefore an opportunity for the SPG to actively promote compliance with these requirements by highlighting the need for rooms within PBMSA development to be suitable for students with disabilities.

13. Does this proposed policy / decision provide an opportunity to actively increase the participation by disabled people in public life?

Explain your assessment in full

The PBMSA SPG will have no effect on participation by disabled people in public life.

14. Monitoring Arrangements

Section 75 places a requirement the Council to have equality monitoring arrangements in place in order to assess the impact of policies and services etc; and to help identify barriers to fair participation and to better promote equality of opportunity.

Outline what data you will collect in the future in order to monitor the impact of this policy / decision on equality, good relations and disability duties.

Equality	Good Relations	Disability Duties
The impact of development on equality, good relation or disability duties will be addressed as part of any subsequent Planning Applications for PBMSA developments in accordance with prevailing planning policies and relevant legislation as part of the application process and will therefore not be monitored directly in relation to this SPG.		
Monitoring of delivery of PBMSA schemes generally and the impact on general housing stock and PBMSA will be considered as part of the new Local Development Plan planning process and any research undertaken in relation to housing need.		

Section D

Formal Record of Screening Decision

Title of Proposed Policy / Decision being screened

Purpose Built Managed Student Accommodation (PBMSA) in Belfast, Supplementary Planning Guidance (SPG)

I can confirm that the proposed policy / decision has been screened for –

X	equality of opportunity and good relations
X	disabilities duties

On the basis of the answers to the screening questions, I recommend that this policy / decision is – *(place an X in the appropriate box below)*

	* <u>Screened In</u> – Necessary to conduct a full EQIA
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X	<p>* <u>Screened Out</u> – No EQIA necessary (no impacts)</p> <p>Provide a brief note here to explain how this decision was reached:</p> <p>As the PBMSA SPG supports and clarifies existing policies, there are no additional negative impacts associated with publication of this document. There are a number of potential minor positive impacts for some Section 75 groups associated with the provision of high quality PBMSA in the right locations and an opportunity to better promote positive attitudes to people with disabilities by highlighting the need for rooms within PBMSA development to be suitable for students with disabilities.</p>
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	<p>* <u>Screened Out - Mitigating Actions</u> (minor impacts)</p> <ul style="list-style-type: none">• Provide a brief note here to explain how this decision was reached:• Explain what mitigating actions and / or policy changes will now be introduced:
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Formal Record of Screening Decision (cont)

Screening assessment completed by (Officer level) -

Name: Martyn Smithson

Date: 22/02/2016

Department : Planning and Place

Signature:



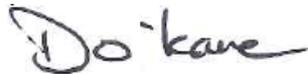
Screening decision approved by -

Name: Dermot O'Kane

Date: 22/02/2016

Department : Planning and Place

Signature:



Please save the final version of the completed screening form and forward to the Equality and Diversity Officer – equality@belfastcity.gov.uk. The screening form will be placed on the BCC website and a link provided to the Council's Section 75 consultees.

For more information about equality screening contact –

Stella Gilmartin / Lorraine Dennis
Equality & Diversity Officer (job-share)
Belfast City Council
City Hall
Belfast
BT1 5GS
Telephone: 028 90270511
equality@belfastcity.gov.uk

Appendix A: Extracts from Equality Impact Assessment for the HMOs Subject Plan for Belfast, December 2008

Results of Screening Matrix showing which Policies have potential impacts on specific section 75 Groups

	Religious Belief	Political Opinion	Racial Group	Age	Marital Status	Sexual Orientation	Gender	Disability	Dependency
Policy HMO 7 Purpose Built Student Accommodation	+	+	+	+	0	0	0	0	0
Totals	2	2	5	5	0	0	0	0	0

Positive	+
Negative	-
Neutral	0

EQUALITY IMPACT ASSESSMENT – HOUSES IN MULTIPLE OCCUPATION SUBJECT PLAN FOR BELFAST			
POLICY	Policy HMO 7 – Purpose Built Student Accommodation		
GENERAL AIM OF POLICY	Policy HMO 7 is designed to accommodate the need and demand for multiple occupation, protect the amenity of other residential areas and promote appropriate development of student accommodation.		
SECTION 75 GROUP	Implications of policy for Section 75 Group	Assessed Potential Effect on Section 75 Group	Mitigation of Impact
RELIGION	This policy will see the development of purpose built student housing on sites which are not currently in housing use, in areas which are considered to be neutral. Consequently such development will not represent a loss of potential housing land to either the Protestant or Roman Catholic community.	It is considered that there is a significant positive effect on all religious groups as it increases potential availability of HMO Student accommodation within Purpose Built Developments outside traditional residential areas and reduces the need for student accommodation in traditional housing areas	Mitigation of impact not necessary as this policy compensates for any loss of HMO accommodation through policies HMO 1 and HMO 5.
POLITICAL OPINION	Assuming a correlation between political opinion and religion at Ward level, particularly in respect of longer term residents, the implications/consequences are regarded to be the same as those for religious groups.	Due to the content of this policy it is considered that there is a significant positive effect on all political groups as it increases potential availability of HMO Student accommodation within Purpose Built Developments outside traditional residential areas.	Mitigation of impact not necessary as this policy compensates for any loss of HMO accommodation through policies HMO 1 and HMO 5.
RACIAL GROUP	The Policy will help ease housing pressures in traditional housing areas, particularly those where both students and migrant workers are concentrated. (See Map 5.)	It is considered that there is a significant positive effect on certain racial groups e.g. migrant workers since there will be a lesser need to compete with students for affordable housing.	Mitigation of impact not necessary as policy compensates for any negative impact of Policy HMO 1 and HMO 5 and any potential detrimental impacts in terms of provision of HMO accommodation.
AGE	The Policy will help ease housing pressures in traditional housing areas, particularly those where both students and other singles are concentrated. (See Map 2). Furthermore the policy will increase the level of accommodation available to students.	It is considered that there is a significant positive effect on certain age groups e.g. young persons / students by increasing availability of student accommodation.	Mitigation of impact not necessary as policy compensates for any negative impact of Policy HMO 1 and HMO 5 and any potential detrimental impacts in terms of provision of HMO accommodation.