



# Equality Screening Template

Review of advertising requirements  
for Planning Applications

## Belfast City Council - Equality Screening Template

The Council has a statutory duty to screen all policies. Please note a policy can be written or unwritten, formal or informal. 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. Please note a policy can be written or unwritten, formal or informal.

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. To find out about the training contact – [gilmartins@belfastcity.gov.uk](mailto:gilmartins@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<sup>1</sup> and what they mean in practice is available on the Equality Commission's website.

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

**Section A** - asks you to provide details about the policy / decision that is being screened.

**Section B** - has 4 key questions that require you to outline the likely impacts on equality groups, and all supporting evidence.

**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.

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<sup>1</sup> ECNI 'Section 75 of the NI Act 1998: A Guide for Public Authorities' April 2010. [www.equalityni.org](http://www.equalityni.org)

# Section A

## Details about the policy / decision to be screened

**Title of policy / decision to be screened:** - Review of the advertising requirements for planning applications.

**Brief description of policy / decision to be screened:** - This is a revision of the policy concerning the newspaper advertising requirements for planning applications. The current policy of the Council is the same as that used by the Department of the Environment Planning Service, prior to the transfer of planning to local government on 1<sup>st</sup> April 2015. It is now eight months since planning transferred and the Council believes that by revising this existing policy the financial burden on the Council can be significantly reduced, while continuing to adhere to its legal obligations in respect of advertising planning applications. The Planning (General Development Procedure) Order (Northern Ireland) 2015 (Article 8), requires that planning applications should be advertised in at least one newspaper circulating in the locality in which the development takes place. The Council currently advertises in the Belfast Telegraph, Irish News, Newsletter, Andersonstown News, North Belfast News and South Belfast News. This is consistent with the policy previously used by the Department of the Environment, prior to the transfer of planning to councils on 1<sup>st</sup> April 2015. There may be financial or procurement implications depending on the decision taken.

**Aims and objectives of the policy / decision to be screened:** - The main aim of the Policy is to reduce the financial burden on the Council in terms of advertising planning applications. It is estimated that the Council will spend in the region of £350k on advertising planning applications in 2015/16, there is evidence that advertising through newspapers has a minimal impact on informing the public and resulting in relevant representations regarding planned development. The revised policy aims to satisfy existing legislative requirements while at the same time reducing a sizeable financial burden to the council on a process which anecdotally appears to produce little by way of desired outcomes.

## On whom will the policy / decision impact?

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

- Staff: no impact
- service users  
For some applicants this will require them to buy a specified newspaper/s to review current planning applications, view them on the council website, or contact the planning service directly
- other public sector organizations: no impact
- voluntary / community groups / trade unions:  
Same as for service users
- others, please specify: Local newspaper /media industry  
Depending on the policy which is chosen there may be possible reduced income for newspapers, namely the Belfast Telegraph, the Newsletter (Ulster Edition), the Irish News and other local newspapers distributed or sold in and around Belfast, e.g. the various editions of the Belfast News.

**Are there linkages to other Agencies/ Departments? No.**

## Section B

### 1. Outline consultation process achieved or planned

- Internal staff consultation – Including Chief Management Team, Corporate Communications, Equality Unit and Planning Service.
- This revised policy will be presented to the Consultative forum in February 2016.
- Department of the Environment – Planning Policy Division, other councils.

#### Public Bodies

A consultation process is not proposed as it is not considered to be necessary. It is unlikely that any person will be negatively impacted by the suggested revision to our policy. The policy will reduce the financial burden on the Council. None of the categories of persons who are protected under Section 75 of the Northern Ireland Act 1998 are likely to be impacted negatively by the revisions to the policy.

The changes to the existing policy are designed to reduce the cost burden on the council whilst continuing to fulfill the legislative requirement to advertise. Based on the evidence gathered, there is minimal indication that advertising in newspapers achieving its purpose, as the majority of objections to planning applications are not received as a result of newspaper advertisements but through neighbour notification, council website and word of mouth.

It would appear that if the current system is not reviewed, the Council will be faced with additional costs for advertising as application for planning development continues to increase.

## **2. 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. Please note: It is important to record information gathered from a variety of sources such as:

- Monitoring information – readership and circulation figure for local newspapers.
- Objections / comments on applications
- Research /surveys – comparison of advertising costs with other councils and the mechanism public use to access information on planning application.
- Review of other public authorities

The Council has reviewed the current circulation and readership figures for the newspapers which it currently uses to advertise planning applications. These figures have been used to inform the revision to the current policy. The Council has also undertaken comparative analysis with other councils in Northern Ireland on the costs they pay for advertising planning applications. In addition the Council has sought information from members of the public who have previously commented on planning applications in an attempt to ascertain the mechanism by which they are made aware of planning applications.

The evidence which has been gathered and considered in relation to this policy revision is outlined in the attachments provided at Appendix 1, 2, 3 and 4.

<b>Section 75 category</b>	<b>Details of evidence / information and engagement</b>
Religious belief	
Political opinion	
Racial group	
Age	
Marital status	
Sexual orientation	
Men & women generally	
Disability	
Dependants	

**3. 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	None	None
Political opinion	None	None
Racial group	None	None
Age	None	None
Marital status	None	None
Sexual orientation	None	None
Men and women generally	None	None
Disability	None	None
Dependants	None	None

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

<b>Section 75 category</b>	<b>If Yes, provide details</b>	<b>If No, provide reasons</b>
<b>Religious belief</b>		No, matter is too generic
<b>Political opinion</b>		As above
<b>Racial group</b>		As above
<b>Age</b>		As above
<b>Marital status</b>		As above
<b>Sexual orientation</b>		As above
<b>Men and women generally</b>		As above
<b>Disability</b>		As above
<b>Dependants</b>		As above

**5.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?**

<b>Good relations category</b>	<b>Likely impact?</b>	<b>Level of impact? Minor/Major/None</b>
<b>Religious belief</b>	None	None
<b>Political opinion</b>	None	None
<b>Racial group</b>	None	None

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

<b>Good relations category</b>	<b>If Yes, provide details</b>	<b>If No, provide reasons</b>
Religious belief		No, matter is too generic
Political opinion		As above
Racial group		As above

## 7. Multiple Identities

Provide details of data on the impact of the policy on people with multiple identities.

Specify relevant Section 75 categories concerned.

None

## Section C

Belfast City Council also has legislative obligations to meet under the [Disability Discrimination Order](#) and Questions 5 -6 relate to these two areas.

### Consideration of Disability Duties

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

#### Explain your assessment in full

It is considered that the proposed revision to the current practice for advertising planning applications in newspapers will neither promote nor have a negative impact on the promotion of positive attitudes towards disabled people. The policy as outlined in some detail above is generic in nature and it is anticipated there will be no specific impact on s.75 categories.

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

**Explain your assessment in full**

It is anticipated that the revised policy will neither actively increase nor decrease the participation of disabled people in public life.

**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.

<b>Equality</b>	<b>Good Relations</b>	<b>Disability Duties</b>
Complaints will be considered.	Complaints will be considered.	Complaints will be considered.

# Section D

## Formal Record of Screening Decision

<b>Title of Proposed Policy / Decision being screened</b> Review of the advertising of planning applications
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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

<input type="checkbox"/>	* <b><u>Screened In</u></b> – Necessary to conduct a full EQIA
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X	<p>*<b><u>Screened Out</u></b> – No EQIA necessary (no impacts)</p> <p>Provide a brief note here to explain how this decision was reached:</p> <p><b>The decision by Belfast City Council to revise the newspapers it will advertise planning applications does not have any impact on the protected categories provided for under Section 75 of the Northern Ireland Act.</b></p>
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<input type="checkbox"/>	<p>* <b><u>Screened Out - Mitigating Actions</u></b> (minor impacts)</p> <ul style="list-style-type: none"> <li>• Provide a brief note here to explain how this decision was reached:</li> <li>• Explain what mitigating actions and / or policy changes will now be introduced:</li> </ul>
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## Formal Record of Screening Decision (cont)

### Screening assessment completed by (Officer level) -

Name: Ian Harper

Building Control Manager

Date: 14 January 2016

Department: Chief Executives (Planning and Place function)

Signature:



### Screening decision approved by -

Name: Phil Williams

Director of Planning and Place

Date: 14 January 2016

Department : Chief Executives (Planning and Place function)

Signature:



Please save the final version of the completed screening form and forward to the Equality and Diversity Officer – [gilmartins@belfastcity.gov.uk](mailto:gilmartins@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**

**Belfast City Council**

**City Hall**

**Belfast**

**BT1 5GS**

**Telephone: 028 90270511**

[equality@belfastcity.gov.uk](mailto:equality@belfastcity.gov.uk)

## Appendix 1

### Daily paper readership figures (most up to date 2015 figures)

Target (All adults)	Bel Tel	Irish News	News Letter	Daily Mirror
<b>Readership</b>	<b>155,000</b>	<b>154,000</b>	<b>65,000</b>	<b>186,400</b>
<b>Protestant</b>	95,300	12,300	49,400	61,500
<b>Catholic</b>	44,500	131,000	12,000	109,000
<b>City of Belfast &amp; Greater Belfast</b>	89,400	52,200	13,100	64,400
<b>Rest of NI</b>	66,100	102,000	51,900	122,000

Source: NITGI2015

- Please note that NITGI doesn't add the individual readerships together to get the combined readership figures.
- NITGI has a metric whereby you select the combination of papers required and it works out the readership based on placing an advert in each paper

### Daily paper circulation figures

*(Av. Jan-Jun + Jul-Dec)	<i>Jan-Jun 2015</i>	Jan-Dec 2014*	Jan-Dec 2013*	Jan-Dec 2012*	Jan-Dec 2011*
<b>Belfast Telegraph</b>	<i>44,141</i>	69,669	72,293	76,415	83,016
<b>Irish News</b>	<i>37,666</i>	58,699	60,694	61,883	64,043
<b>News Letter</b>	<i>17,511</i>	27,628	30,287	32,749	34,382
<b>Daily Mirror</b>	<i>43,621</i>	67,813	70,973	75,803	80,721

- The Audit Bureau of Circulations provides an independent verification of newspaper daily circulation figures.

### Notes:

The coverage and readership figures above have been sourced from NITGI. This stands for Northern Ireland Target Group Index and is a research package which is widely used to provide media consumption information which includes demographic and geographic breakdowns on daily newspaper titles.

The readership figures included above do not include Belfast Media Group title i.e. Andersonstown News, South Belfast News and North Belfast News as these titles are not included within the NITGI research as they are weekly titles.

**Belfast Media Group provides the following information about their titles.**

#### **Weekly circulation:**

Andersonstown News 14,000  
 South Belfast News 8,000  
 North Belfast News 6,000

#### **Readership**

(Belfast Media Group calculate their readership by multiplying the circulation by 3.5; this is not researched by NITGI). There is no further readership analysis available.

Andersonstown News - 49,000  
 South Belfast News - 28,000  
 North Belfast News - 21,000

## Appendix 2 - comparison to other councils

Advertising of planning applications	Papers used	Annual cost (estimate)
Antrim & Newtownabbey Borough Council	Newtownabbey Times and Antrim Guardian.	£55 - £60k
Ards and North Down Borough Council	Newtownards Chronicle & Co Down (Bangor) Spectator	£40k
Armagh City, Banbridge & Craigavon Borough Council	Armagh Observer, Banbridge Chronicle, Banbridge Leader, County Down Outlook, Lurgan Mail, Lurgan & Portadown Examiner, Portadown Times, Ulster Gazette	£115k
Belfast City Council	Belfast Telegraph, Irish News, Newsletter, Andersonstown News, South Belfast News, North Belfast News	£350k
Causeway Coast and Glens District Council	Coleraine Chronicle	£40k
Derry City and Strabane District Council	Derry Journal, Londonderry Sentinel, Strabane Chronicle, Strabane Weekly News, Tyrone Constitution, Ulster Herald	100k
Fermanagh and Omagh District Council	Not available	Not available
Lisburn and Castlereagh City Council - Lisburn	Belfast Telegraph	£95k
Mid and East Antrim Borough Council	Larne Times, Carrick Times, Ballymena Times and Ballymena Guardian	£75 - £80k
Mid Ulster District Council (*based on revised arrangement where they reduced from 5 papers to the two shown.)	Tyrone Courier (Dungannon applications) Mid Ulster Mail (Magherafelt & Cookstown applications)	£50 - £55k
Newry, Mourne and Down District Council	Mourne Observer; Down Recorder; Newry Reporter; Crossmaglen Examiner; Rathfriland Outlook and Armagh & Down Observer	£112k
	<b>TOTAL</b>	<b>£1,140,000</b>
	<b>Previous DOE annual spend (14-15)</b>	<b>£810,000</b>

## Appendix 3 - Job advertising figures

1/10/14 - 30/9/15

Source	Number of applicants	%
N/A	2	0.07%
Careers fair	3	0.11%
Specialist journal	3	0.11%
News Letter	6	0.23%
Twitter	11	0.43%
Irish News	32	1.26%
Sunday Life	32	1.26%
Facebook	32	1.26%
Jobs kiosk	55	2.16%
Training & Employment Agency	84	3.31%
Belfast Telegraph	199	7.80%
Jobline	295	11.62%
NI jobfinder	353	13.91%
Internal Trawl	474	18.68%
Council website	956	37.68%
<b>Total</b>	<b>2537</b>	

**Note:** Belfast Telegraph, Sunday Life and Jobfinder are all within the same package

BT/SL/NI Jobfinder package		22.97%
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#### Appendix 4

Members of the public can request to review applications at Planning Service reception. To evaluate the effectiveness of the advertisements, reception staff asked the public how they became aware of the applications they review. The results are as follows:

Period of survey	16/10/15 – 5/1/2016	Sample total	31
Became aware of applications due to:	Neighbour notification	Advertisement in paper	Other (e.g. website, word of mouth)
Number	8	3	20
%	26%	10%	64%

The service has also carried out a postal survey of those who have submitted formal comments, mainly objections, to planning applications. The results are as follows:

Survey Date	7 <sup>th</sup> December 2015		No. of people surveyed				376
			No. of people who responded				108
			Response rate				29%
Became aware of applications due to:	Neighbour notification	Advertisement in paper	Told by another person e.g. local resident	BCC website	Other media sources	Other	
Number	59	15	40	4	2	13	
%	44%	11%	30%	3%	2%	10%	

\*Note:

- where multiple methods were identified by those who responded, all were taken into account (133 in total)
- of the 15 who indicated that they found out about the planning application by newspaper advert, 8 indicated that they also found out through another source