

**Annex A: Controlling the Concentration of Houses in Multiple  
Occupation Supplementary Planning Document Local Plan Working  
Group Report, 31<sup>st</sup> March 2014**

## **Controlling the Concentration of Houses in Multiple Occupation Supplementary Planning Document**

### **Summary**

1. This report provides an overview of recent advice issued by the Planning Inspectorate (PINS) in relation to Houses in Multiple Occupation (HMOs) and Permitted Development (PD) Rights. It requests that Cabinet approve factual amendments to the Controlling the Concentration of HMOs Supplementary Planning Document (SPD) to reflect the advice of the Planning Inspectorate (PINS).

### **HMOs and PD Rights**

2. When the Controlling the Concentration of Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD) was updated following the Local Plan Working Group on 9<sup>th</sup> December and Cabinet on 7<sup>th</sup> January the view was that HMOs did not benefit from Permitted Development (PD) rights. This was the view held by several other Local Authorities on this issue at that time. Additional text was added to the SPD at paragraph 5.21 to clarify PD rights for HMOs.
3. On the 15<sup>th</sup> January PINS issued an advice note to its inspectors regarding HMOs and PD rights (attached for information). In it PINS has indicated that 'Houses in Multiple Occupation, including those which fall within Class C4 can benefit from the permitted development rights granted to dwellinghouses by the General Permitted Development Order (GPDO)'. This means that a HMO does benefit from PD Rights unless it does not accord with the definition of a "dwelling house" or it contains, or is, a flat. The definition of dwelling house is including in Annex 1, the advice note produced by PINS.
4. This implies that a typical HMO does benefit from Part 1 of the GPDO. It is likely that Inspectors will attach significant weight to the advice note. Particularly given recent appeal decisions in November

2013, December 2013, and January 2014 in which the Inspectors concluded that an HMO does benefit from Part 1 of the GPDO and have PD rights. This means that those Local Planning Authorities that continue to apply the interpretation that an HMO does not benefit from Part 1 of the GPDO (i.e. by attaching limited weight to the advice note) are likely to find that their interpretation is not supported at appeal. In light of this Officers are of the view that the Council should now see HMOs as having PD rights.

5. The PD rights afforded to HMOs are set out in Annex 2, an extract from Schedule 2, Town and Country Planning (Use Classes) Order 1987 (as Amended).

### **Proposed Amendments to SPD**

6. The following factual amendments to the SPD are suggested to ensure that it is fit for purpose and reflects current national advice on the issue:

*A number of changes and additions to the rights to carry out works or change the use of land or buildings without needing planning permission have been made through changes to Permitted Development Rights in May 2013. This includes changes to domestic rear extensions. For HMOs falling under the new Use Class C4 the Council's position on this at present is that they do not benefit from permitted development rights and therefore planning permission is required for additions/alterations to these type of properties. Following advice from the Planning Inspectorate the Council's present position is that small HMOs can normally benefit from permitted development rights. However there maybe some cases, for example bed sit type large HMOs, where not all HMOs would necessarily have permitted development rights. It is recommended that an application for a Lawful Development Certificate for proposed development is submitted or pre-application advice from the Council is sought. For further information on the pre-application service provided by the Council please contact planning enquires on 01904 551550 or at [planning.enquiries@york.gov.uk](mailto:planning.enquiries@york.gov.uk)*

## Options

7. The following options are available for Cabinet to consider:

**Option 1** – approve the proposed minor factual amendments to paragraph 5.21 of the Controlling the Concentration of HMOs SPD.

**Option 2** – do not approve the application subject to amendments to the Neighbourhood Plan boundary and request that Officers explore the issue further.

## Analysis

8. As set out above, it is likely that Inspectors will attach significant weight to the PINS advice note. This means that if City of York Council attaches limited weight to the advice note and continue to apply the interpretation that an HMO does not benefit from PD rights the Council are likely to find that it is not supported at appeal.

## Council Plan

9. Controlling the concentration of HMOs relates to the following Council Plan Priorities:

- Build strong communities.
- Protect vulnerable people.
- Protect the environment.

## Implications

10. The implications are as listed below:

- **Financial:** None
- **Human Resources (HR):** None
- **Equalities:** None
- **Legal:** None
- **Crime and Disorder:** None
- **Information Technology (IT):** None
- **Property:** None
- **Other:** None

## **Risk Management**

11. No significant risks are associated with the recommendations in this report have been identified.

## **Recommendations**

12. The Local Plan Working Group recommends Cabinet to:

- (i) Approve the proposed minor factual amendments to paragraph 5.21 of the Controlling the Concentration of HMOs SPD as per Option 1.

Reason: So that the SPD is fit for purpose and reflects current national advice.

### **Contact Details:**

#### **Author**

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Planning and Environmental  
Management  
Tel No: (01904) 551338

#### **Chief Officer Responsible for the report**

Michael Slater  
Assistant Director Development  
Services, Planning and  
Regeneration

**Report Approved**  **Date** 21/03/14

### **Specialist Implications Officer(s)**

There are no specialist officer implications.

### **Wards Affected:**

**All**

**For further information please contact the authors of the report.**

## **Glossary of Abbreviations**

**Annex A:** Copy of PINs advice note to Inspectors

**Annex B:** Extract from Schedule 2, Town and Country Planning (Use Classes) Order 1987 (as Amended)

**Annex B: Streetscape Strategy Guidance Local Plan Working Group  
Report, 31<sup>st</sup> March 2014**

## **City of York Streetscape Strategy and Guidance**

### **Summary**

1. This guidance document is part of the Reinvigorate York programme and consists of a strategic overview, detailed analysis of, and guidance for, the maintenance, management and enhancement of, city's streets and spaces. It includes six key strategic principles and an implementation framework. Its purpose is to inform the council's own work in the public realm and the work of others: developers, utility companies and others. This document is the final edited document following a period of extensive public and internal consultation. The Local Plan Working Group are being asked to agree the document as part of supporting evidence for local plan policy and development management purposes. They are also asked to support or recommend its consideration by cabinet or cabinet member for adoption as a key council document.

### **Background**

2. The Streetscape Strategy and Guidance Document (Other cities will describe this as a public realm strategy) has been strongly recommended by the City Centre Movement & Accessibility Framework; Alan Simpson's New City Beautiful City of York Economic Vision; the Historic Core Conservation Area Appraisal and the Footstreets Review. York remained one of the few cities without a public realm strategy. The production and delivery of this was recognised as a priority for the Reinvigorate York Board to inform the implementation of city centre improvement work and annual maintenance, renewal and enhancement of the city's streets and spaces.

## **Consultation**

3. The draft document had extensive public and stakeholder consultation. The public consultation period ran from 5<sup>th</sup> of June to 31<sup>st</sup> July 2013. A total of 59 detailed responses from the public were received. Internal consultation included an officer and member workshop and one-to-one consultations with a number of key officers involved with: street cleaning; the better bus fund; cycling; road maintenance; conservation; street signs; streetworks; highway engineering and urban design. The consultation has also specifically benefited from input from English Heritage and the York Civic Trust.

## **Options**

- Option one: To accept the document and support or recommend its consideration by cabinet or cabinet member for adoption as a key council document.
- Option two: to reject the document and not to support or recommend its consideration by cabinet or cabinet member for adoption as a key council document.

## **Analysis**

4. Option two would not be realistic as the document has been out to extensive consultation with the overwhelming response being extremely positive. The document is also urgently required to provide much needed and long overdue guidance in the use of materials and street furniture in the city. All consultation responses were very detailed and it is unlikely that anything of significance has been missed and the final document has been copy edited.

## **Council Plan**

5. The document helps deliver against Protecting Vulnerable People. The strategy and guidance was heavily informed by a City Centre Access & Mobility Audit commissioned of access consultants. The document also delivers against Protect the Environment by setting standards for the public realm, helping to improve the safety and

accessibility of the city's streets and spaces as well as improving the look and feel of the historic core and other areas.

## **Implications**

7.

- **Financial** there are no direct financial implications.
- **Human Resources (HR)** none
- **Equalities** none, although the document content has a positive impact on equalities
- **Legal** none
- **Crime and Disorder** none
- **Information Technology (IT)** none
- **Property** none

## **Risk Management**

8. There are no risks associated with this report.

## **Recommendations**

9. Members are recommended to:

In line with Option 1, accept the document and support or recommend its consideration by Cabinet or Cabinet Member for adoption as a key council document.

Reason: The document is urgently required to provide much needed and long overdue guidance in the use of materials and street furniture in the city.

## Contact Details

**Report Author:**  
Bob Sydes  
Heritage Renaissance  
Officer  
Tel : 01904 551329

**Chief Officer Responsible for the Report:**  
Martin Grainger  
Head of Integrated Strategy  
Tel: 01904 551317

**Report Approved**

**Date** 21<sup>st</sup> March, 2014

**Wards Affected: All**

**All**

**For further information please contact the author of the report**

## Annexes

Annex A: The City of York Streetscape Strategy and Guidance Consultation Responses.

Annex B: The City of York Streetscape Strategt and Guidance.

**Annex C: Local Plan Working Group Minutes, 31<sup>st</sup> March 2014**

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Meeting	Local Plan Working Group
Date	31 March 2014
Present	Councillors Merrett (Chair), Ayre, Barnes, D'Agorne, Horton, Reid, Riches, Simpson-Laing, Steward, Watt (Vice-Chair) and Levene (Sub for Cllr Funnell)
Apologies	Councillor Funnell

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### 13. **DECLARATIONS OF INTEREST**

Members were asked to declare any personal interests not included on the Register of Interests, any prejudicial interests or any disclosable pecuniary interests which they may have in respect of the business on the agenda.

Councillor Merrett declared a personal interest in relation to Agenda item 5 (City of York Streetscape Strategy and Guidance) as an honorary member of the Cycle Touring Club and as a York Cycle Campaign member.

Councillor D'Agorne also declared a personal interest in relation to Agenda item 5 (City of York Streetscape Strategy and Guidance) as a member of the Cycle Touring Club and the York Cycle Campaign.

### 14. **MINUTES**

Arising out of discussion of the minutes, Officers confirmed that they would report back their findings to Members in relation to the final two bullet points in Minute 12 – City of York Council and North York Moors National Park Minerals and Waste Joint Plan. <sup>1</sup>.

Resolved: That the minutes of the last meeting of the Group held on 13 January 2014 be approved and signed by the Chair as a correct record.

Action Required

1. Email Members outcome of exploratory work in relation to MG these outstanding points.

**15. PUBLIC PARTICIPATION**

It was reported that there had been no registrations to speak at the meeting under the Councils Public Participation Scheme.

**16. CONTROLLING HOUSES IN MULTIPLE OCCUPATION - SUPPLEMENTARY PLANNING DOCUMENT.**

Consideration was given to a report which provided details in relation to recent advice issued by the Planning Inspectorate in relation to Houses in Multiple Occupation (HMO) and Permitted Development Rights.

It was noted that when the HMO Supplementary Planning Guidance (SPD) had been updated, earlier in the year, the view had been that HMO's did not benefit from permitted development rights and text to this effect had been added into the SPD. However, since that time, an advice note had been issued confirming that HMO's, including those falling within Class 4, could benefit from the permitted development rights granted to dwelling houses.

To ensure that the SPD was fit for purpose and reflected current national advice Members were requested to amend the SPD accordingly.

Members expressed concerns at the proposed changes including the impact this could have on residential streets and at recent appeal decisions on HMO properties. It was suggested that information relating to the number of bedrooms should be recorded when HMO applications were submitted.

Consideration was then given to the following options:

**Option 1** – approve the proposed minor factual amendments to paragraph 5.21 of the Controlling the Concentration of HMOs SPD.

**Option 2** – do not approve the application subject to amendments to the Neighbourhood Plan boundary and request that Officers explore the issue further.

- Recommended:
- i) That Cabinet approve the proposed minor factual amendments to paragraph 5.21 of the Controlling the Concentration of HMO's Supplementary Planning Guidance as outlined in Option 1 in the report.
  - ii) That Officers be requested to monitor the number of pre-applications received in relation to permitted development rights on HMO's in order to gain a comprehensive picture of the affect of this change.

Reason: So that the SPD is fit for purpose and reflects current national advice.

## **17. CITY OF YORK STREETScape STRATEGY AND GUIDANCE.**

Members considered a report which presented the City of York Streetscape Strategy and Guidance document at Annex A which gave a strategic overview, detailed analysis and guidance for the maintenance, management and enhancement of the city's streets and spaces, as part of the Reinvigorate York programme.

As York remained one of the few cities without a public realm strategy the production of this had been seen as a priority for the Reinvigorate York Board to inform future city centre improvement work.

Officers presented the document, outlining the problems which they had tried to overcome, the 6 key strategic principles and the proposed implementation framework. It was noted that Officers had, as far as possible, included all the comments received. Members expressed their appreciation to Officers for the work undertaken.

Members made a number of comments in relation to the document the main ones being:

### **General**

- York's attractiveness came from its differences, the buildings and roofscapes
- Questioned how the report related to the rural areas and villages. Officers confirmed that the detail in the document had been designed to relate to the urban area however the principals related to all areas of the city.
- Request for a presumption in favour of the retention of York flagstones when works were required on the city's footpaths. Officers confirmed that wherever possible this would be done, however the paving policy, referred to in the report, was only an operating document rather than an approved policy
- Key Gateway streets appeared to have been overlooked e.g. Layerthorpe
- Secondary Shopping Streets – it was unclear as to which part of Heworth the report was referring to on the map at page 185
- Questioned default style of bollard/bins suggested and policy for changing this, if appropriate. Officers confirmed that the default furniture was the baseline and other types, such as more contemporary styles may be suitable in some locations but should be of a high quality and reflect the setting. Replacement would be undertaken as and when necessary.

### **Detailed Comments**

- Request to remove personal details in the consultation responses. Officers confirmed that this would be done.
- Page 110 – The Vision: Reference in fifth paragraph to “Our visions for York are that:  
York must be for people/York must be for everyone”  
Officers agreed to remove one of these references
- Need to ‘keep things simple’ for dementia sufferers. Officers confirmed that this document would help simplify the public realm for both residents and visitors
- Request for wayfinding city information maps to be correctly orientated to assist visitors
- Page 129 - Principle 6: Light and dark: key message regarding architectural lighting required adding in to the

text and there was a need to ensure safety in the darker areas. Officers agreed to reword this section accordingly

- Page 132 – Footnote 4: amend to read ‘pers. comm, Sir Ron Cooke’
- Page 136 – Footways: Officers confirmed that recommended paving was available in specially reinforced versions that could be used in areas where vehicle over-run was likely
- Page 144 – Cycle Lanes and Tracks: consider some rewording in relation to the reference to cycle lanes on carriageways being at least 1.5m wide, recognising that although this was the target, some compromises may be required
- Grates and service covers should be level with the carriageway. Grates should be laid perpendicular to the direction of travel to ensure cyclists safety.
- Request for careful lighting design to ensure streetlights on footpaths did not leave the path in darkness. It was noted that this often related to lantern design and that discussions would be undertaken with highway Officers.
- Reference to the issues of lighting in private car parks. Officers to add in reference to light pollution in appropriate section
- When replacing high level lighting, note should be taken of the location of adjacent trees and lighting sited accordingly
- Architectural lighting trial – Officers to report back on results
- Page 148 - Pavement Cafes: expand final bullet point to include the appropriateness of parasols
- Page 153 – Planters and Planting Beds: Photo to be added of a raised bed
- Page 154 – Public Art: Second line to read ‘William Etty’ and third paragraph to include reference to ‘The Chalfonts’
- Officers confirmed that the ‘Wayfinding Strategy for the City’ would be looking at street advertisement of city events and the Digital York initiative at the digital aspects of advertising
- Officers confirmed that the authority had no control over advertising on public utility street cabinets however one of the next steps would involve discussions with these bodies
- Page 162 – Waste Management: reference to a number of city centre businesses without suitable areas to store waste bins. Confirmed that Officers were looking at the

possibility of trialling a fenced area or providing bins elsewhere for businesses to deposit their waste.

- Page 165 – Cycling Signage: prior to removal of any cycle lane signs Officers to check with Police as to their legal necessity
- Page 167: Insert photo of good example of wall mounted sign
- Page 167 – Street Signs: noted that in some areas, traditional signage for street names was also sited on the lamppost of the street opposite. Officers agreed to add in the reference
- Page 184/185 – Secondary Zones: Locations – Officers to include definition of secondary shopping streets and correct naming of streets on the map
- Page 188 – Street Furniture – include reference to bus stops
- Page 196 – Ban on all ‘for sale’ and to ‘let signs’ in conservation areas – suggested working with agents to reduce need for advertising which could now be undertaken online

Consideration was also given to the extensive consultation responses and to the following options:

Option one: To accept the document and support or recommend its consideration by cabinet or cabinet member for adoption as a key council document.

Option two: to reject the document and not to support or recommend its consideration by cabinet or cabinet member for adoption as a key council document.

- Recommended:
- i) That, in line with Option1 Cabinet approve adoption of the City of York Streetscape Strategy and Guidance document subject to the above mentioned amendments and additions.
  - ii) That consideration be given to future expansion of this work to cover the rural areas of the city.

Reason:

As this document is urgently required to provide much needed and long overdue guidance in the use of materials and street furniture in the city.

Cllr D Merrett, Chair

[The meeting started at 5.00 pm and finished at 6.50 pm].

**Annex D: Community Impact Assessment for Minutes from 31<sup>st</sup> March  
2014 Local Plan Working Group**

## Community Impact Assessment: Summary

### 1. Name of service, policy, function or criteria being assessed:

Minutes from the Local Plan Working Group 31<sup>st</sup> March 2014 in relation to:

- Controlling the Concentration of Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD); and
- City of York Streetscape Strategy and Guidance.

### 2. What are the main objectives or aims of the service/policy/function/criteria?

Houses in Multiple Occupation, or HMOs as they are commonly referred to, represent a significant and growing proportion of the mix of housing in York. Whilst HMOs are regarded as a valuable asset to the city's housing offer there has been debate about the wider impacts that concentrations of HMOs are having on neighbourhoods and increasing rental costs. In monitoring the spatial distribution and impacts of student housing the Council are able to identify if it is necessary to prevent an increase in the number of student households in certain areas to ensure communities do not become imbalanced. The aim of the policy is to continue to provide HMO accommodation to meet the City's housing needs but to manage the supply of new HMOs to avoid high concentrations of this use in an area. Given York's compact nature and well connected public transport network it is considered that the spreading out of HMOs to avoid unsustainable concentrations of HMOs will still mean that for students in particular, HMOs will remain highly accessible.

This Streetscape Strategy and Guidance has been prepared in response to recent studies which recommended that a clear strategy was needed for York's streets and spaces. York remained one of the few cities without a public realm strategy. The main purpose of the document is to encourage a quality approach to the management of our streets and spaces, to ensure consistency, and to underline the importance of moving towards a fully accessible city. It will inform the council's own work in the public realm and the work of others: developers, utility companies and others. The City of York Streetscape Strategy and Guidance supports the emerging City of York Local Plan. The document proposes a priority of locations for enhancement. Guidance is provided on best practice for surfacing, street furniture and traffic management.

### 3. Name and Job Title of person completing assessment:

Frances Harrison – Development Officer

<b>4. Have any impacts been Identified? (Yes/No)</b>  <p style="text-align: center;">Yes</p>	<b>Community of Identity affected:</b>  <p style="text-align: center;">Age</p>   <p style="text-align: center;">Disability</p>	<b>Summary of impact:</b>  <p style="text-align: center;">Meeting housing needs and improving the safety and accessibility of the city's streets and spaces.</p>  <p style="text-align: center;">Improving the safety and accessibility of the city's streets and spaces.</p>
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**5. Date CIA completed: 13<sup>th</sup> June 2014**

**6. Signed off by: Martin Grainger**

**7. I am satisfied that this service/policy/function has been successfully impact assessed.**  
**Name: Martin Grainger**  
**Position: Head of Planning and Environmental Management**  
**Date: 13<sup>th</sup> June 2014**

<b>8. Decision-making body:</b>  <p style="text-align: center;">Cabinet</p>	<b>Date:</b>  <p style="text-align: center;">1<sup>st</sup> July 2014</p>	<b>Decision Details:</b>
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**Send the completed signed off document to [equalities@york.gov.uk](mailto:equalities@york.gov.uk). It will be published on the intranet, as well as on the council website.**  
**Actions arising from the Assessments will be logged on Verto and progress updates will be required**

## Community Impact Assessment (CIA)

### Community Impact Assessment Title:

**Minutes from the Local Plan Working Group 31<sup>st</sup> March 2014 in relation to Controlling the Concentration of Houses in Multiple Occupation Supplementary Planning Document and the Streetscape Strategy and Guidance**

What evidence is available **to suggest that the proposed service, policy, function or criteria could have a negative (N), positive (P) or no (None) effect** on quality of life outcomes? (Refer to guidance for further details)

Can negative impacts be justified? **For example: improving community cohesion; complying with other legislation or enforcement duties; taking positive action to address imbalances or under-representation; needing to target a particular community or group e.g. older people.** NB. Lack of financial resources alone is NOT justification!

### Community of Identity: Age

Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
Controlling the Concentration of HMOs Supplementary Planning Document (2014) Streetscape Strategy and Guidance (2014)		Standard of Living	P	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date

<p>The HMO Supplementary Planning Document ensures the continued provision of HMOs to meet the city’s housing needs. It will have a positive impact on providing flexible and affordable accommodation for student and young professionals in particular.</p> <p>The Streetscape Strategy and Guidance document sets standards for the public realm, helping to improve the safety and accessibility of the city’s streets and spaces. This will have positive impacts for all ages.</p>	N/A	N/A	N/A	N/A
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**Community of Identity: Carers of Older or Disabled People**

<b>Evidence</b>		<b>Quality of Life Indicators</b>	<b>Customer Impact (N/P/None)</b>	<b>Staff Impact (N/P/None)</b>
N/A		N/A	N/A	N/A
<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A

### Community of Identity: Disability

Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
Streetscape Strategy and Guidance (2014)		Standard of Living	P	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
The Streetscape Strategy and Guidance document was heavily informed by a City Centre Access & Mobility Audit commissioned of access consultants. The document sets standards for the public realm, helping to improve the safety and accessibility of the city's streets and spaces. This will have a positive impact on those people with a disability.	N/A	N/A	N/A	N/A

### Community of Identity: Gender

Evidence	Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
N/A	N/A	N/A	N/A

<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A

**Community of Identity: Gender Reassignment**

<b>Evidence</b>		<b>Quality of Life Indicators</b>	<b>Customer Impact (N/P/None)</b>	<b>Staff Impact (N/P/None)</b>
N/A		N/A	N/A	N/A
<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A

**Community of Identity: Marriage & Civil Partnership**

<b>Evidence</b>		<b>Quality of Life Indicators</b>	<b>Customer Impact (N/P/None)</b>	<b>Staff Impact (N/P/None)</b>
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N/A		N/A	N/A	N/A
<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A

<b>Community of Identity: Pregnancy / Maternity</b>				
<b>Evidence</b>		<b>Quality of Life Indicators</b>	<b>Customer Impact (N/P/None)</b>	<b>Staff Impact (N/P/None)</b>
N/A		N/A	N/A	N/A
<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A

<b>Community of Identity: Race</b>				
<b>Evidence</b>		<b>Quality of Life Indicators</b>	<b>Customer Impact (N/P/None)</b>	<b>Staff Impact (N/P/None)</b>

N/A		N/A	N/A	N/A
<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A

**Community of Identity: Religion / Spirituality / Belief**

<b>Evidence</b>		<b>Quality of Life Indicators</b>	<b>Customer Impact (N/P/None)</b>	<b>Staff Impact (N/P/None)</b>
N/A		N/A	N/A	N/A
<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A

**Community of Identity: Sexual Orientation**

<b>Evidence</b>		<b>Quality of Life Indicators</b>	<b>Customer Impact (N/P/None)</b>	<b>Staff Impact (N/P/None)</b>
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N/A		N/A	N/A	N/A
<b>Details of Impact</b>	<i>Can negative impacts be justified?</i>	<b>Reason/Action</b>	<b>Lead Officer</b>	<b>Completion Date</b>
N/A	N/A	N/A	N/A	N/A