

Equality Impact Assessment Screening Opinion

Community Infrastructure Levy (CIL)
Charging Schedule – Initial Consultation

March 2021



Introduction

1. It is the Council's duty under the Equality Act 2010 to undertake an Equality Impact Analysis at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified, then a full Equalities Impact Assessment will be required.
2. There are currently two separate Community Infrastructure Levy (CIL) Charging Schedules operating in East Suffolk, firstly in the former Waveney District Council area (which was adopted in 2013) and secondly, in the former Suffolk Coastal District Council area (which was adopted in 2015). A CIL Charging Schedule sets out the levy costs which are required to be made by developers to support the delivery of infrastructure in a specified area, which can be varied by development type, size and area. It has now been decided to prepare a single CIL Charging Schedule for East Suffolk.
3. The adopted Waveney (2019) and Suffolk Coastal (2020) Local Plan set out various housing and other development allocations and requirements, including for (amongst others) i) affordable housing requirements and ii) specialist housing requirements (such as retirement accommodation and care homes). Equalities Impact Assessments were prepared to accompany both Local Plan documents. Key Local Plan elements such as affordable housing amounts cannot be re-considered during the CIL Charging Schedule preparation process.
4. The East Suffolk Community Infrastructure Levy (CIL) Initial Consultation document on basic assumptions has been informed by research and analysis being produced by consultancy Aspinall Verdi, which has been appointed to provide specialist viability information (a Viability Report) for East Suffolk Council. It sets out research, information and cost assumptions related to various aspects of different types of development and seeks views on them. As such it will be of particular interest to architects, designers, agents, landowners and developers, but may also be of interest to parish/town councils, businesses, community groups and infrastructure providers. The CIL Charging Schedule Initial Consultation document is divided into the following sections with opportunities for comment:
 - 1a) Background and introduction
 - 1b) Strategic-scale sites in the Suffolk Coastal and Waveney Local Plans

- a. SCLP12.29
- b. SCLP12.64
- c. SCLP12.3
- d. SCLP12.19
- e. WLP2.16
- f. WLP3.1
- g. WLP2.13
- h. WLP2.4

2. Residential development

- a. Approach to greenfield residential typologies
- b. Approach to brownfield residential typologies
- c. Build costs for houses
- d. Build costs for flats
- e. Cost of external works for services and infrastructure
- f. Cost of site abnormalities
- g. Cost of professional fees
- h. Statutory planning application fees
- i. Cost of planning application fees, surveys and reports
- j. Allowance for contingency costs
- k. Recreational Disturbance Avoidance Mitigation Strategy (RAMS)
- l. Cost of facilitating independent living (Part M4(2) of the Building Regulations)
- m. Cost of water efficiency
- n. Carbon dioxide and energy obligations
- o. Selling agents' costs
- p. Sale legal costs
- q. Cost of scheme marketing and promotion
- r. Profit on market housing
- s. Profit on affordable housing
- t. Cost of interest
- u. Stamp Duty Land Tax on land value
- v. Legal fee on land value
- w. Land values
- x. Sale values
- y. Biodiversity net gain
- z. Affordable housing value inputs
- aa. Build-out rates

- bb. CIL and Section 106 agreements
3. Holiday accommodation viability testing
 - a. Typologies
 - b. Build costs
 - c. CIL and Section 106 agreements
 4. Specialist residential accommodation testing
 - a. Typologies
 - b. Building and market cost assumptions
 - c. Building and sale period assumptions
 - d. CIL and Section 106 agreements
 5. Retail, office and industrial development
 - a. Convenience retail assumptions
 - b. Comparison retail assumptions
 - c. Office and industrial development assumptions
 - d. Development costs for retail, office and industrial development
 - e. Building costs for comparison retail
 - f. Building costs for office
 - g. Building costs for industrial
 - h. Cost of external works for services and infrastructure
 - i. Cost allowance for site abnormalities
 - j. Cost of professional fees assumptions
 - k. Contingency assumptions
 - l. Letting agent costs assumptions
 - m. Letting legal costs assumptions
 - n. Investment sale agent's costs assumptions
 - o. Marketing and promotion costs assumptions
 - p. Profit assumptions
 - q. Interest
 - r. Finance fee
 - s. Stamp Duty Land Tax on land value
 - t. Agent's fee on land value,
 - u. Legal fee on land value,
 - v. CIL and Section 106 agreements

5. The consultation responses to the key information and approaches outlined in the CIL Charging Schedule Basic Assumptions Consultation document will assist the Council in developing a new CIL Charging Schedule for the whole of East Suffolk. Almost all the elements consulted on are either standard development costs or requirements set by particular (adopted) Local Plan policies.

6. The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. East Suffolk Council has added a tenth characteristic, socio-economic deprivation, in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across East Suffolk.

Screening of impact on different groups

	Groups	Likely Impact (positive/negative/no impact)	Reason for your decision
a	Age (includes safeguarding issues)	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs associated with different types of developments, researched by consultancy Aspinall Verdi and it specifically includes specialist housing for elderly people (such as care homes and sheltered housing). The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
b	Disability	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs

			associated with different types of developments researched by Aspinall Verdi and it specifically includes an allowance to facilitate independent living (accessible and adaptable dwellings). The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
C	Gender reassignment	No impact	The CIL Charging Schedule Initial Consultation document provides information and assumptions on the costs associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
D	Marriage and Civil Partnership	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
E	Pregnancy and maternity	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information

			and assumptions on the costs associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
F	Race	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
G	Religion or Belief	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
H	Sex	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs

			associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
I	Sexual orientation	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group
J	Socio-economic deprivation	No impact	The CIL Charging Schedule Basic Assumptions Consultation document provides information and assumptions on the costs associated with different types of developments researched by Aspinall Verdi. The consultation seeks responses from developers, agents, interested bodies, parish councils and the public. It will therefore not discriminate against this group.

Consultation and Engagement

7. During the preparation of the CIL Charging Schedule Initial Consultation document there have been regular steering group meetings with colleagues in East Suffolk Council including Planning Policy, Infrastructure Delivery, and Major Sites and Infrastructure Officers. There have also been regular meetings with consultants from Aspinnall Verdi.
8. In view of the current Covid-19 social distancing measures, the Council has set out measures to enable safe participation in the consultation and to ensure that those who wish to engage in the consultation are not disadvantaged. The Council would normally make hard copies of consultation documents available to view in libraries and in the Council's offices for those who are unable to view them online; however, as this is not possible to do this at this time due to the Covid-19 pandemic, the Council has put alternative measures in place. For those unable to view the consultation documents online, hard copies are being made available on request (free of charge) by post. In view of these measures the Council does not consider that this consultation will disadvantage any of the groups covered by this EQIA screening exercise.

Presentation in Different Languages

9. As part of a six-week period of formal consultation (15th May-26th April), the document will be published on the Council's website, with hard copies available on request for those unable to access it online. The document may be requested in a different language. When such requests are received the Customer Services Team will be involved with ensuring this request is actioned.

Proposed Changes

10. The Council will analyse responses received during the public consultation and will make any necessary changes as a result of comments received.

Conclusion

11. No negative impact upon any group with protected characteristics or experiencing socio-economic deprivation was identified and therefore a full Equality Impact Assessment is not required.