

# Equality Impact Assessment Screening Opinion

East Suffolk Community Infrastructure Levy  
(CIL) Draft Charging Schedule

October 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. The East Suffolk Community Infrastructure Levy Draft Charging Schedule (CIL Charging Schedule) is a charge on development that pays for the cost of infrastructure to support development throughout the District. There are different rates of CIL charge for different types of development. The CIL is a Council programme and so has the potential to impact upon groups that are protected under the Equality Act. Therefore, an Equalities Impact Assessment Screening Opinion is needed. This will enable the Council to ascertain whether there are any negative impacts upon these groups, in which case a full Equality Impact Assessment will be needed.
3. There are currently two separate CIL Charging Schedule 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 and size. It has now been decided to prepare a single CIL Charging Schedule for East Suffolk.
4. Viability work has been undertaken to ensure that the East Suffolk Community Infrastructure Levy charging schedule will not impact upon development viability. It also ensures that development will continue to be able to meet policy requirements detailed in the Suffolk Coastal Local Plan and Waveney Local Plan in terms of the delivery of housing for those of different age groups, as well as those with a health problem or disability. The CIL charging schedule also covers issues such as housing size and different types of tenure.
5. 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.

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

	<b>Groups</b>	<b>Likely Impact</b> (positive/negative/no impact)	<b>Reason for your decision</b>
a	Age (includes safeguarding issues)	Positive impact	The draft CIL Charging Schedule details the amount of CIL payable for different types of development. Funding raised by CIL is partly used to provide housing for the elderly. It will therefore benefit this group. Consultation documents will be available online and can be provided in hard copy on request. The consultation materials will be available to people of all ages and therefore will not discriminate in terms of age.
b	Disability	No impact	The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. The consultation will therefore not

			discriminate against those with a disability.
C	Gender reassignment	No impact	The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. This consultation will therefore not discriminate against those who have undergone gender reassignment.
D	Marriage and Civil Partnership	No impact	The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. This consultation will therefore not discriminate against those who are married or in a civil partnership.
E	Pregnancy and maternity	No impact	The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. This consultation will therefore not discriminate against those who are pregnant or on maternity leave.

F	Race	No impact	<p>The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. The consultation will therefore not discriminate against those from any racial background.</p>
G	Religion or Belief	No impact	<p>The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. The consultation will therefore not discriminate against those of different religious beliefs.</p>
H	Sex	No impact	<p>The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. The consultation will therefore not discriminate against those of different sexual identities.</p>
I	Sexual orientation	No impact	<p>The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon</p>

			<p>this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. The consultation will therefore not discriminate against those of different sexual orientations.</p>
J	Socio-economic deprivation	No impact	<p>The draft CIL Charging Schedule details the amount of CIL payable for different types of development. It will therefore not impact upon this group. Consultation documents will be available online and can be provided in hard copy on request so that they can be viewed by all. The consultation will therefore not discriminate against those who are experiencing socio-economic deprivation.</p>

## Consultation and Engagement

7. During the preparation of the CIL Charging Schedule 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 Aspinall Verdi.
8. There has been consultation during the preparation of the CIL Charging Schedule. An initial informal consultation took place between 15<sup>th</sup> March 2021 and 26<sup>th</sup> April 2021, on the basic assumptions for the draft CIL Charging Schedule. Members of the Town and Parish Councils, Suffolk County Council, East Suffolk Councillors, neighbouring district Councils including the Broads Authority, developers, agents, landowners, business associations, civic societies, infrastructure providers), and public were consulted.
9. The initial consultation was presented at East Suffolk Council's Developer Forum meeting on 15th April 2021. The presentation included information on the preparation of the CIL Charging Schedule, details of the key assumptions for the CIL Charging Schedule, links to

the consultation documents and an opportunity for questions and discussion. In addition, Council officers gave presentations to two East Suffolk Council Parish Council Forums in April 2021.

10. In total of 10 individuals and organisations responded to the consultation on the CIL Charging Schedule and 3 responded to the CIL Instalment Policy. The Council's response and how the comments informed the preparation of the CIL Charging Schedule is detailed in the Consultation Statement.
11. A second public consultation will take place from 11<sup>th</sup> November to 23<sup>rd</sup> December 2021 on the Draft CIL Charging Schedule. Consultation letters and emails will be sent to consultees. Publication online, in posters, newsletters and press releases will take place. The consultations will contact members of the Town and Parish Councils, Suffolk County Council, East Suffolk Councillors, neighbouring district Councils including the Broads Authority, developers, agents, landowners, business associations, civic societies, infrastructure providers), and members of the public.
12. 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. For those unable to view the consultation documents online, hard copies will be made available on request (free of charge) by post. For those who cannot view the consultation documents online or receive them by post, the Council will make hard copies available to view in libraries that are open and willing to host documents and in the Council's customer service centres by appointment. 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

13. As part of a six-week period of formal consultation, 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

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

## Conclusion

15. 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.