

Equality Impact Assessment Screening Opinion

Affordable Housing Supplementary
Planning Document

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. Chapter 1 provides an introduction to the Affordable Housing SPD. The overarching aim of the SPD is to facilitate the delivery of affordable housing in accordance with the Local Plan policies. The guidance contained in this SPD will assist in the implementation of policies contained in the Local Plans for East Suffolk regarding affordable housing, and as an SPD this guidance will, when adopted, be a material consideration in determining applications for planning permission.
3. This SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
4. The guidance in the SPD may also be relevant to the implementation of Neighbourhood Plan policies that relate to affordable housing.
5. This document provides guidance which will be relevant during the preparation and determination of any planning applications which involve affordable housing, or for which the Local Plan policies concerning affordable housing are relevant.
6. 1 Introduction. This chapter provides background information about the document and explains what affordable housing is.
7. 2 Types of affordable housing. This chapter explains the different types of affordable housing that are available.
8. 3 Identifying an appropriate mix of affordable housing. This chapter explains how developers should provide an appropriate mix of different types of affordable housing on each site.

9. 4 Section 106 Agreements. This chapter explains the role of section 106 agreements in delivering affordable housing.
10. 5 Financial contributions. This chapter provides an overview of how financial contributions towards affordable housing are being calculated. This includes the way in which commuted sums are calculated and spent.
11. 6 Exception sites. This chapter explains that exceptions sites are ones where housing development would not normally be permitted but that development may be acceptable where it delivers affordable housing. This chapter includes the policy background to exceptions sites, an explanation of where exceptions sites should be located, the housing mix included in exceptions sites and the delivery of exceptions sites.
12. 7 Design. This chapter states that good design is an important part of meeting the policy aspirations of the two Local Plans. It provides a definition of good design and makes the point that good design should be applicable to all housing, regardless of type or tenure. Other issues include housing density, types and sizes of housing, housing for people with a disability, distribution of affordable homes, sustainable construction and housing in the countryside.
13. 8 Local housing need assessments. This chapter explains the role of housing needs assessments. This includes data and information sources and applying the results.
14. 9 Viability assessments. This chapter provides an overview of the role of viability assessments, including the policy background and cross refers to the guidance contained in the Local Plans.
15. 10 Vacant buildings credit. This chapter explains the vacant building credit, including the policy background and how it should be applied. This includes an explanation of how CIL charges would be levied on a vacant building.
16. 11 Community infrastructure levy. This chapter provides an overview of the Community Infrastructure Levy (CIL), which is a tariff levied on development that contributes towards infrastructure costs. It explains that affordable housing can be exempt from CIL charges.
17. 12 Making an application. This chapter provides an overview of the planning application process as it applies to affordable housing.

18. The Affordable Housing SPD will help to implement policies contained in the Suffolk Coastal and Waveney Local Plans, both of which have been subject to an Equality Impact Assessment screening. The following Local Plan policies will be implemented by the Affordable Housing SPD:

Suffolk Coastal Local Plan

SCLP5.10: Affordable Housing on Residential Developments

SCLP5.11: Affordable Housing on Exception Sites

Waveney Local Plan

WLP8.2: Affordable Housing

WLP8.6: Affordable Housing in the Countryside

19. 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 the 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)	Positive	The Affordable Housing SPD includes guidance on the provision of affordable housing that is designed for older people or to be modified for older people. This will benefit this age group. Consultation documents will be available online, in libraries and in the Council’s customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by

			<p>post, if needed. The consultation materials will be available to people of all ages and therefore will not discriminate in terms of age.</p>
b	Disability	Positive	<p>The Affordable Housing SPD includes guidance on the provision of affordable housing for people with a disability. This will benefit this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those with a disability.</p>
C	Gender reassignment	No impact	<p>The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those who have undergone gender reassignment.</p>

D	Marriage and Civil Partnership	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. This consultation will therefore not discriminate against those who are married or in a civil partnership.
E	Pregnancy and maternity	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those who are pregnant or on maternity leave.
F	Race	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries

			and in the Council’s customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against people from any racial background.
G	Religion or Belief	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council’s customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against people from different religious beliefs.
H	Sex	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council’s customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending

			hard copies by post, if needed. The consultation will therefore not discriminate against those of different sexual identities.
I	Sexual orientation	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those of different sexual orientations.
J	Socio-economic deprivation	Positive	The Affordable Housing SPD includes guidance on the provision of affordable housing. This will benefit those who are experiencing socio-economic deprivation. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will be therefore not against those who are experiencing socio-economic deprivation.

Consultation and Engagement

During the preparation of the Affordable Housing Supplementary Planning Document there have been regular steering group meetings with colleagues in East Suffolk Council including Planning Policy, Housing, Development Management and CIL/Section 106.

The following organisations and groups were consulted as part of the initial consultation:

- Registered Providers of affordable housing
- Community led housing organisations
- Town and Parish Councils
- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Home Builders Federation
- Homes England
- Members of the public

The initial consultation ran from **9th November to 21st December 2020** and the consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/affordablehousingspd2020/consultationHome>

The consultation was advertised on the Council's website, as well as on social media. A questionnaire, providing some background to the consultation and asking a series of questions, was published on the Council's website. Town and parish councils, elected members and other organisations referred to above were notified directly by email or post.

Hard copies of the document were also made available free of charge by contacting the Planning Policy and Delivery team as the usual locations for viewing documents were closed to the public during this time, due to the pandemic.

In total 22 individuals and organisations responded to the consultation. Between them they made 194 comments.

A second public consultation will take place from 1st November to 13th December 2021 on the Draft Affordable Housing SPD. This Affordable Housing SPD consultation will be held at the same time as the Sustainable Construction SPD and Walking and Cycling Strategy consultations (note the consultation on the Cycling and Walking Strategy has a later end date of 10th January). Consultation letters and emails covering all three consultations will be sent to consultees on the Council's planning policy mailing list. Posters and press releases covering all three consultations will take place, and information will be contained

in the Council's Planning and Building Control Newsletter. The planning policy mailing list includes 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.

Hard copies of consultation documents will be available online, in libraries and in the Council's customer service centres. Due to the ongoing Covid-19 pandemic, contact details have been provided in publicity material along with an offer of assistance in accessing the consultation material, should anyone be unable to view the documents in any of the ways set out above.

In view of the ongoing Covid-19 pandemic, 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, in libraries or in the Customer Service Centres, hard copies will be 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

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

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

Conclusion

This EQIA screening exercise shows that the Affordable Housing SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.