

RIBBLE VALLEY BOROUGH COUNCIL

REPORT TO PLANNING AND DEVELOPMENT COMMITTEE

meeting date: THURSDAY 13 APRIL 2023
title: TECHNICAL CONSULTATION ON THE INFRASTRUCTURE LEVY
submitted by: DIRECTOR OF ECONOMIC DEVELOPMENT AND PLANNING
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1 PURPOSE

1.1 To update Members on the technical consultation on the Infrastructure Levy.

1.2 Relevance to the Council's ambitions and priorities:

Community Ambitions-

- To sustain a strong and prosperous Ribble Valley
- To protect and enhance the existing environmental quality of our area
- To match the supply of homes in our area with the identified housing needs.

2 BACKGROUND

2.1 The Levelling Up and Regeneration Bill ('the Bill') seeks to replace the current system of developer contributions with a mandatory, more streamlined, and locally determined Infrastructure Levy. The Bill provides the framework for the new Levy, with the detailed design to be delivered through regulations.

2.2 The Bill introduces the following components of the Levy:

- The Levy will be a mandatory charge.
- Levy rates are to be set by charging authorities (generally the local authority), and when setting rates, they must take into account certain factors. This includes the viability of development in the area and the desirability that rates can deliver affordable housing at a level equalling or exceeding what developers deliver now in that area.
- There is a process of examination in public of Infrastructure Levy charging schedules, in order for rates to be adopted.
- The Secretary of State for DLUHC can intervene in the preparation of charging schedules in certain circumstances.
- Charging authorities must publish an Infrastructure Delivery Strategy.

2.3 Once the Bill reaches Royal Assent, these elements of the Infrastructure Levy will feature in primary legislation. Therefore, the government is not seeking views on these aspects of the Levy. This technical consultation seeks responses on those elements of design that will be delivered through regulations, made under the framework set out in primary.

2.4 This consultation will last for 12 weeks from 17 March to 9 June 2023. Following the closure of the consultation, the government will assess responses. In doing so, a response will be issued that summarises the themes that emerged, before issuing a final consultation on the draft regulations after the Levelling Up and Regeneration Bill achieves Royal Assent

3 PROPOSED LEVY

3.1 The Infrastructure Levy will be a locally-set, mandatory charge levied on the final value of completed development (charged to the GDV per m² of completed development). The

intention of linking the levy to the final development value means that the amount collected will increase as development prices increase, or reduce as prices drop, which is intended to make the Levy more responsive to market conditions.

3.2 The final GDV will be reflected in the sales price of the development, or a valuation of the market price if the development is not sold.

3.3 Local authorities will be responsible for setting Levy rates, charging, collecting, and spending the Levy, enabling the Levy to reflect local circumstances and priorities. There are three main elements to operating the Levy:

- (i) setting the Levy.
- (ii) charging and collecting the Levy; and
- (iii) spending the Levy.

3.4 It is proposed to delineate between different types of infrastructure under the Levy:

- 'Integral' infrastructure, which is needed for a site to function, will be delivered by developers primarily through the use of planning conditions.
- 'Levy-funded infrastructure' refers to infrastructure that is supported by Levy receipts and mitigates the cumulative impact of new development on the local area.

3.5 Local authorities will be required to prepare a new document, called an Infrastructure Delivery Strategy, which will set out the local authority's strategic plans for infrastructure delivery to support growth and how they intend to spend the Levy to address infrastructure and affordable housing need. On-site affordable housing on residential schemes will be delivered predominantly as an in-kind payment of the Levy through a new 'right to require'. The 'right to require' will see a percentage of the Levy value delivered in-kind by developers as on-site affordable housing.

3.6 In respect of implementation DHLUC intend to take a phased 'test and learn' approach to implementation will see the Levy introduced in selected local authorities in the first instance, before full roll-out across England. It is expected that 'test and learn' authorities will introduce charging schedules from late 2024/25 and operate the Levy from 2025/26. National rollout will occur over the course of a decade and the current system will remain in place in areas which have not adopted the Levy.

4 DESIGN ELEMENTS OF THE LEVY

4.1 It is anticipated that most development types will be subject to the Levy, including residential, commercial, and industrial development. A straightforward approach, the first question within the consultation queries whether this is a suitable way forward, will be to maintain the definitions from CIL, which define what does not constitute development, including:

- 4.1.1 Development of less than 100 square metres, unless this consists of one or more dwellings.
- 4.1.2 Buildings into which people do not normally go.
- 4.1.3 Buildings into which people go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery.
- 4.1.4 Structures which are not buildings, such as pylons and wind turbines

4.2 In terms of development sites two categories of infrastructure would be identified, which are:

- (1) infrastructure needed for a scheme to function, which is 'integral' to the site and will be delivered by developers outside of the Levy charge (for most schemes, payment of the Levy will require a certain percentage of the liability to be delivered in-kind as affordable housing) and
- (2) 'Levy-funded' infrastructure delivered by the local authority using cash receipts from the Levy

- 4.3 Integral infrastructure includes items such as those listed below, and LPAs will need to consider the costs of ‘integral’ infrastructure when preparing their charging schedules.
- Cycle parking areas
 - Electric vehicle charging points.
 - Carbon reduction design measures to meet building regulations.
 - Biodiversity enhancements and net gain
 - On-site play areas and open space for residents
 - Any requirements of a Section 278 or Section 38 agreement (of the Highways Act 1980)
- 4.4 It is intended that planning conditions will be the primary means of securing ‘integral’ infrastructure, though planning conditions cannot cover all scenarios where this kind of infrastructure will be required. To ensure ‘integral’ infrastructure is successfully secured, DHLUC are proposing to retain a constrained, narrowly targeted use of s106 agreements, known as ‘Delivery Agreements’.
- 4.5 The receipts from ‘Levy-funded’ infrastructure will be used to deliver infrastructure that is required because of planned growth that will have a cumulative impact on an area and creates the need for new infrastructure to mitigate its impact. Examples of ‘Levy-funded’ infrastructure could include:
- Expansion or improvements to local healthcare infrastructure such as GP surgeries or the provision of new facilities
 - Expansion or improvements to schools and other educational facilities, including the provision of childcare facilities.
 - Provision of play equipment and other street furniture outside of the site boundary
 - Strategic green infrastructure and tree planting/maintenance
 - Enhancements to local play pitches or sports facilities
- 4.6 Levy receipts can also be passed to third parties such as county councils, highways authorities, and water and sewerage undertakers, if they are best placed to deliver the infrastructure.
- 4.7 It is not proposed to remove Section 106 Agreements completely as they will still be necessary. To create a clear distinction over how s106 agreements should be used in different circumstances, it is proposed to create three distinct routeways for securing developer contributions. How infrastructure is secured and how s106 agreements operate in each routeway will vary, and this will reflect the size and type of site being brought forward. The 3 routeways are as follows:
1. The core Levy routeway- s106 agreements in this routeway will be a new product – ‘Delivery Agreements’ – that will be used to secure ‘integral’ infrastructure in circumstances where conditions cannot be used
 2. Infrastructure in-kind routeway- it is proposed to retain negotiated s106 planning obligations for large and complex sites however the value of any contributions towards infrastructure will have to equal or exceed the value of what otherwise would be secured through a calculation of the Infrastructure Levy and usage of legal agreements will be limited
 3. S106-only routeway- A minority of developments, such as those which do not meet the definition of development (such as mineral and waste sites), will not be charged to the Levy and remain subject to s106 planning obligations as now

5 LEVY RATES AND MINIMUM THRESHOLDS

- 5.1 In determining a charging schedule local authorities must have regard to various factors. These include the degrees to which revenues and levels of affordable housing generated by developer contributions will compare to those at present, the viability of development, and an Infrastructure Delivery Strategy (to outline how local authorities intend to spend

Levy receipts, including the proportion to be put towards affordable housing). Local authorities will use appropriate available evidence to inform how they prepare their charging schedules, and the schedule will then be subject to public examination.

5.2 A minimum threshold for Levy liability will need to be set (on a £ per m² basis), below which the Levy will not be charged. The Levy will be applied as a percentage figure charged on the GDV of a scheme above the minimum threshold. Levy rates will be charged to the internal area (m²) of a development as a percentage of the final GDV (£ per m²) above this minimum threshold. It is intended for the minimum threshold to be indexed to a measure of inflation, to account for variations in build costs.

5.3 Levy rates and minimum thresholds will need to be set at levels appropriate to be charged to sites that are typical of a typology of development which is in a local authority's area. A core part of this judgement will be the premium that is allowed for landowners above existing use value, in order to incentivise a landowner to bring their site forward for development.

5.4 We will have to prepare an evidence base to draft Levy rates and thresholds in collaboration with key stakeholders, including neighbouring and overlapping authorities. The draft schedule will then be published for consultation, in response to which representations are sought. Those representations must be considered prior to submission for examination. An independent person, the examiner, will examine the schedule in public before their recommendations are published.

6 CHARGING AND PAYING THE LEVY

6.1 The final Infrastructure Levy liabilities will be based on GDV at completion, which will be responsive to market conditions. The final GDV will be reflected in the sales price of the development, or a valuation of the market price if the development is not sold. It is envisaged that the calculation and payment of the Levy will be achieved through a three-step process. The calculation of an indicative liability, the calculation and payment of a provisional liability, and the calculation and discharge of a final adjustment payment.

7 DELIVERING INFRASTRUCTURE

7.1 As part of the Levy Local authorities will be required to prepare a new document, called an Infrastructure Delivery Strategy. This will support consideration of infrastructure requirements arising from planned development in the area and will set out how Levy receipts will be directed to the affordable housing and infrastructure needed to support it.

7.2 It is currently envisaged that the Infrastructure Delivery Strategy should contain the local authority's approach to the following:

Part 1: The baseline of infrastructure provision in their area, how this will be impacted by anticipated growth and what infrastructure will be required to support it.

Part 2: The approach to funding infrastructure through the Levy as well as other funding sources such as existing s106 and CIL receipts.

Part 3: Once this evidence has been gathered, part 3 of the Infrastructure Delivery Strategy will set out the strategic Levy spending plan, setting out the local infrastructure priorities that will be funded by the Levy. The spending plan in the Infrastructure Delivery Strategy will reflect the prioritisation choices of the local authority, but the priorities are not binding on a local authority as there will need to be the flexibility to apply the Levy differently in response to the specifics of a development. However, if the overall approach to prioritisation changes, the Infrastructure Delivery Strategy will need to be updated.

7.3 Provision for an independent examination of the Infrastructure Delivery Strategy (combined with either the examination of a charging schedule or a Local Plan) will be required. The examination of the Infrastructure Delivery Strategy will ensure that the local authority has had due regard to its obligation to consult and take account of

consultation responses, and to any national policy or guidance around the development and contents of Infrastructure Delivery Strategies and the application of Levy revenues. That includes, but is not limited to, providers of education, healthcare, emergency services, and transport infrastructure.

8 DELIVERING AFFORDABLE HOUSING

8.1 On-site affordable housing will be delivered predominantly as an in-kind payment of the Levy through a new 'right to require'. This will see a percentage of the Levy value delivered in-kind by developers as on-site affordable housing, protecting it from the pressure of other spending priorities.

8.2 Local authorities will need to evidence whether the rates they set will be able to keep affordable housing at levels that equal or exceed the level of affordable housing provided through developer contributions during a previous time-period.

8.3 Under the 'right to require' the local authority will set out the proportion of the Levy that must be delivered in-kind, on-site affordable housing and developers will be obliged to provide that in-kind contribution as set out by the 'right to require'.

9 OTHER AREAS

9.1 The Bill allows a proportion of the Levy to be directed towards communities, as a neighbourhood share. This will build on the approach taken in CIL, in which a proportion of funds are passed on to a parish or town council. The spending of the Neighbourhood Share should be based on evidence showing what neighbourhoods want to improve in their area. This can range from typical infrastructure improvements to funding for tackling anti-social behaviour.

9.2 In a local authority charging the Infrastructure Levy, local authorities will set out the value of the neighbourhood share in their Infrastructure Delivery Strategy and how they determine and calculate this will be set out through regulations and guidance, reflecting any nationally set minimum proportion.

9.3 The consultation acknowledges that Local authorities will encounter significant expenses in shifting to a new Levy system and using the Levy to fund these costs will be important. The Bill will enable administrative expenses to be met under the Infrastructure Levy.

9.4 There are several existing exemptions to CIL, charitable relief etc, which are intended to be retained in the new Levy.

9.5 In terms of enforcement issuance of Stop Notices will be permitted to prevent development commencing when no assumption of Infrastructure Levy liability is in place. Restrictions on occupation will also be imposed unless and until the provisional Levy liability is paid for a development or phase of development. Failure to pay Infrastructure Levy liabilities will be met with financial penalties.

10 INTRODUCING THE LEVY

10.1 The government will introduce the Levy over an extended period through a 'test and learn' approach. This will see the Levy introduced in a representative minority of local authorities in the first instance, prior to a nationwide rollout to all English authorities

11 RECOMMEND THAT COMMITTEE

11.1 Note the consultation and the list of questions asked (Appendix 1). The Director of Economic Development and Planning will formally response to the consultation questions.

NICOLA HOPKINS

DIRECTOR OF ECONOMIC DEVELOPMENT AND PLANNING

Appendix 1- list of Infrastructure Levy technical consultation questions

Chapter 1 – Fundamental design choices

Question 1: Do you agree that the existing CIL definition of ‘development’ should be maintained under the Infrastructure Levy, with the following excluded from the definition:

- developments of less than 100 square metres (unless this consists of one or more dwellings and does not meet the self-build criteria) – Yes/No/Unsure
- Buildings which people do not normally go into - Yes/No/Unsure
- Buildings into which peoples go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery - Yes/No/Unsure
- Structures which are not buildings, such as pylons and wind turbines. Yes/No/Unsure

Please provide a free text response to explain your answer where necessary.

Question 2: Do you agree that developers should continue to provide certain kinds of infrastructure, including infrastructure that is incorporated into the design of the site, outside of the Infrastructure Levy? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.

Question 3: What should be the approach for setting the distinction between ‘integral’ and ‘Levy-funded’ infrastructure? [see para 1.28 for options a), b), or c) or a combination of these]. Please provide a free text response to explain your answer, using case study examples if possible.

Question 4: Do you agree that local authorities should have the flexibility to use some of their Levy funding for non-infrastructure items such as service provision? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary.

Question 5: Should local authorities be expected to prioritise infrastructure and affordable housing needs before using the Levy to pay for non-infrastructure items such as local services? [Yes/No/Unsure]. Should expectations be set through regulations or policy? Please provide a free text response to explain your answer where necessary.

Question 6: Are there other non-infrastructure items not mentioned in this document that this element of the Levy funds could be spent on? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary.

Question 7: Do you have a favoured approach for setting the ‘infrastructure in-kind’ threshold? [high threshold/medium threshold/low threshold/local authority discretion/none of the above]. Please provide a free text response to explain your answer, using case study examples if possible.

Question 8: Is there anything else you feel the government should consider in defining the use of s106 within the three routeways, including the role of delivery agreements to secure matters that cannot be secured via a planning condition? Please provide a free text response to explain your answer.

Chapter 2: Levy rates and minimum thresholds

Question 9: Do you agree that the Levy should capture value uplift associated with permitted development rights that create new dwellings? [Yes/No/Unsure]. Are there some types of permitted development where no Levy should be charged? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.

Question 10: Do you have views on the proposal to bring schemes brought forward through permitted development rights within scope of the Levy? Do you have views on an

appropriate value threshold for qualifying permitted development? Do you have views on an appropriate Levy rate 'ceiling' for such sites, and how that might be decided?

Question 11: Is there is a case for additional offsets from the Levy, beyond those identified in the paragraphs above to facilitate marginal brownfield development coming forward? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary, using case studies if possible.

Question 12: The government wants the Infrastructure Levy to collect more than the existing system, whilst minimising the impact on viability. How strongly do you agree that the following components of Levy design will help achieve these aims?

- Charging the Levy on final sale GDV of a scheme [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]
- The use of different Levy rates and minimum thresholds on different development uses and typologies [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]
- Ability for local authorities to set 'stepped' Levy rates [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]
- Separate Levy rates for thresholds for existing floorspace that is subject to change of use, and floorspace that is demolished and replaced [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]

Question 13: Please provide a free text response to explain your answers above where necessary.

Chapter 3 – Charging and paying the Levy

Question 14: Do you agree that the process outlined in Table 3 is an effective way of calculating and paying the Levy? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary.

Question 15: Is there an alternative payment mechanism that would be more suitable for the Infrastructure Levy? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary.

Question 16: Do you agree with the proposed application of a land charge at commencement of development and removal of a local land charge once the provisional Levy payment is made? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary

Question 17: Will removal of the local land charge at the point the provisional Levy liability is paid prevent avoidance of Infrastructure Levy payments? [Strongly Agree/Agree/Neutral/Disagree/ Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Question 18: To what extent do you agree that a local authority should be able to require that payment of the Levy (or a proportion of the Levy liability) is made prior to site completion? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure]. Please explain your answer.

Question 19: Are there circumstances when a local authority should be able to require an early payment of the Levy or a proportion of the Levy? Please provide a free text response to explain your where necessary.

Question 20: Do you agree that the proposed role for valuations of GDV is proportionate and necessary in the context of creating a Levy that is responsive to market conditions [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.

Chapter 4 – Delivering infrastructure.

Question 21: To what extent do you agree that the borrowing against Infrastructure Levy proceeds will be sufficient to ensure the timely delivery of infrastructure? [Strongly Agree/Agree/Neutral/ Disagree/Strongly Disagree/Unsure]. Please provide a free text response to explain your answer where necessary.

Question 22: To what extent do you agree that the government should look to go further, and enable specified upfront payments for items of infrastructure to be a condition for the granting of planning permission? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Question 23: Are there other mechanisms for ensuring infrastructure is delivered in a timely fashion that the government should consider for the new Infrastructure Levy? [Yes/No/Unsure] Please provide free text response to explain your answer where necessary.

Question 24: To what extent do you agree that the strategic spending plan included in the Infrastructure Delivery Strategy will provide transparency and certainty on how the Levy will be spent? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree] Please provide a free text response to explain your answer where necessary.

Question 25: In the context of a streamlined document, what information do you consider is required for a local authority to identify infrastructure needs?

Question 26: Do you agree that views of the local community should be integrated into the drafting of an Infrastructure Delivery Strategy? [Yes/No/Unsure] Please provide a free text response to explain your answer where necessary.

Question 27: Do you agree that a spending plan in the Infrastructure Delivery Strategy should include:

- Identification of general 'integral' infrastructure requirements
- Identification of infrastructure/types of infrastructure that are to be funded by the Levy
- Prioritisation of infrastructure and how the Levy will be spent
- Approach to affordable housing including right to require proportion and tenure mix
- Approach to any discretionary elements for the neighbourhood share
- Proportion for administration
- The anticipated borrowing that will be required to deliver infrastructure
- Other – please explain your answer
- All of the above

Question 28: How can we make sure that infrastructure providers such as county councils can effectively influence the identification of Levy priorities?

- Guidance to local authorities on which infrastructure providers need to be consulted, how to engage and when
- Support to county councils on working collaboratively with the local authority as to what can be funded through the Levy
- Use of other evidence documents when preparing the Infrastructure Delivery Strategy, such as Local Transport Plans and Local Education Strategies
- Guidance to local authorities on prioritisation of funding
- Implementation of statutory timescales for infrastructure providers to respond to local authority requests
- Other – please explain your answer

Question 29: To what extent do you agree that it is possible to identify infrastructure requirements at the local plan stage? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Chapter 5 – Delivering affordable housing

Question 30: To what extent do you agree that the ‘right to require’ will reduce the risk that affordable housing contributions are negotiated down on viability grounds? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Question 31: To what extent do you agree that local authorities should charge a highly discounted/zero-rated Infrastructure Levy rate on high percentage/100% affordable housing schemes? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Question 32: How much infrastructure is normally delivered alongside registered provider-led schemes in the existing system? Please provide examples.

Question 33: As per paragraph 5.13, do you think that an upper limit of where the ‘right to require’ could be set should be introduced by the government? [Yes/No/unsure] Alternatively, do you think where the ‘right to require’ is set should be left to the discretion of the local authority? [Yes/No/unsure]. Please provide a free text response to explain your answer where necessary.

Chapter 6 – Other areas

Question 34: Are you content that the Neighbourhood Share should be retained under the Infrastructure Levy? [Yes/No/Unsure?]

Question 35: In calculating the value of the Neighbourhood Share, do you think this should A) reflect the amount secured under CIL in parished areas (noting this will be a smaller proportion of total revenues), B) be higher than this equivalent amount C) be lower than this equivalent amount D) Other (please specify) or E) unsure. Please provide a free text response to explain your answer where necessary.

Question 36: The government is interested in views on arrangements for spending the neighbourhood share in unparished areas. What other bodies do you think could be in receipt of a Neighbourhood Share in such areas?

Question 37: Should the administrative portion for the new Levy A) reflect the 5% level which exists under CIL B) be higher than this equivalent amount, C) be lower than this equivalent amount D) Other (please specify) or E) unsure. Please provide a free text response to explain your answer where necessary.

Question 38: Applicants can apply for mandatory or discretionary relief for social housing under CIL. Question 31 seeks views on exempting affordable housing from the Levy. This question seeks views on retaining other countryside exemptions. How strongly do you agree the following should be retained:

- residential annexes and extensions; [Strongly Agree/Agree/ Neutral/Disagree/Strongly Disagree]
- self-build housing; [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree]

If you strongly agree/agree, should there be any further criteria that are applied to these exemptions, for example in relation to the size of the development?

Question 39: Do you consider there are other circumstances where relief from the Levy or reduced Levy rates should apply, such as for the provision of sustainable technologies?

[Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.

Question 40: To what extent do you agree with our proposed approach to small sites? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Question 41: What risks will this approach pose, if any, to SME housebuilders, or to the delivery of affordable housing in rural areas? Please provide a free text response using case study examples where appropriate.

Question 42: Are there any other forms of infrastructure that should be exempted from the Levy through regulations?

Question 43: Do you agree that these enforcement mechanisms will be sufficient to secure Levy payments? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary.

Chapter 7 – Introducing the Levy

Question 44: Do you agree that the proposed ‘test and learn’ approach to transitioning to the new Infrastructure Levy will help deliver an effective system? [Strongly Agree/Agree/Neutral/Disagree/Strongly Disagree/Unsure] Please provide a free text response to explain your answer where necessary

Question 45: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Yes/No/Unsure]. Please provide a free text response to explain your answer where necessary.