

Details	
Service or policy title	Community Infrastructure Levy Strategic Planning and Infrastructure
Lead officer (responsible for the policy or service/function)	Christine Thurlow – Professional Lead Key Sites and Infrastructure Strategic Planning Policy and Infrastructure
Officers carrying out the EQIA (<i>it is</i> recommended that an officer responsible for the policy or service/function is involved in completion)	Christine Thurlow – Professional Lead Key Sites and Infrastructure. Strategic Planning Policy and Infrastructure
Is this new or a revision? (If revision state when previous EQIA undertaken) Revision to EIA assessment when the curr CIL rates were adopted by both Councils the 20 th January 2016	
Is this the first time this policy or function has been assessed?	Yes in 2016. It was considered for amendment in 2020 but for the reasons set out in this EIA assessment and in the accompanying Council report the process was not taken forward at this time.
Date of completing this EQIA	10 th February 2025

Description

What exactly is proposed? (Describe the service/policy and the changes that are being planned)

Changes to the adopted Community Infrastructure Levy (CIL) charging schedules for Babergh District Council and Mid Suffolk District Council as CIL Charging Authorities (which were formally adopted and implemented on the 11th April 2016)

Why? (Give reasons why these changes are being introduced)

There are a number of different ways (through CIL or direct provision by developers or through s106 legal agreements attached to the grant of planning permission) in which Infrastructure is delivered following growth within both Districts. Such infrastructure provision is required to ensure that satisfactory provision of infrastructure is delivered for the development both for the benefit of the occupiers of that development and for the whole community in general and the locality in which it is situated.

Community Infrastructure Levy (CIL) monies have been collected since the implementation of CIL on the 11th April 2016 with a range of charges which have remained unaltered and are still in force since that time. At the time of adoption both Councils stated that these rates would not be reviewed within a three-year period following implementation of CIL. This period expired on the 11th April 2019. The Councils started a process of review of both Councils' CIL rates in 2020 but the Inspectors for the Babergh and Mid Suffolk Joint Local Plan (JLP), which the CIL process sat alongside, focused the Districts attention on a part one of the Plan and as the CIL rates were linked to what became part 2 of the plan, this revision to the CIL rates could not proceed at that time.



Viability testing has been carried out (November 2024) given the infrastructure requirements (contained in the current Infrastructure Delivery Plan – IDP – 2020) which has addressed rising development values and infrastructure costs. This viability testing has considered what new rates of CIL would be both viable and appropriate given all these financial considerations going forward.

The revised rates of CIL, which are proposed in the accompanying report, are therefore informed by this viability testing. In view of this and given the rising costs of infrastructure, and the increase of cost multipliers by Infrastructure providers for their infrastructure projects, it is essential to revise CIL rates at this time. All of these measures and, where appropriate, decisions form ways in which necessary infrastructure supporting growth in the Districts are delivered /or prioritised for the benefit of both the Babergh and Mid Suffolk communities.

What will the effect of the changes be? (Describe which people, communities, localities etc. will be affected by the changes)

The Community Infrastructure Levy collects adopted charges to provide funding for infrastructure in support of new development. These charges, and the infrastructure they provide, have the potential to affect anyone who lives, works or visits Babergh and Mid Suffolk Districts and also those who are outside the administrative boundaries of the district. The charges themselves will be levied on new development and therefore affect landowners and developers.

The main customers/beneficiaries of CIL are: -

- Infrastructure and service providers.
- District, Town, Parish and County Councils
- Those involved in the development industry such as developers, landowners, agents
- Organisations and individuals that provide services to residents and organisations.
- Organisations and individuals that represent groups of people;
- All Members of the public and their elected representatives serving the community (including Parish or Town District and County Councillors and Government MPs;
- Internal customers include those service areas responsible for service and infrastructure
- All Members of the community for Babergh and Mid Suffolk included all those included and mentioned in this Equality Impact assessment.

How will it be implemented? (Describe the decision making process, timescales, process for implementation)

The CIL Regulations (2010) as amended prescribe the process under which adoption of CIL rates and their subsequent revision must accord with. In this case Babergh and Mid Suffolk are following the procedures for revision and adoption of revised CIL rates. As such the process will be as follows:-

• Viability testing together with the submission of a final viability report by the Councils Viability Consultants (November 2024)



- Preliminary sharing of this report with agents and developers through the Councils' viability report, a meeting on the 12th February 2025 of the Councils' Client-side Panel (developers' agents' and developers) with the Councils officers and the Viability Consultants who are to give a presentation.
- Presentation of the Councils report on revised CIL rates at both Councils full Council meetings in March (Mid Suffolk on 19th March 2025 and Babergh on 20th March 2025)
- 6 week formal consultation on the revised CIL rates (in late Spring/early Summer) to:-

Consultees

- Major development Housebuilders (10 dwellings and above)
- Minor development Housebuilders (9 dwellings and below)
- Planning Consultants (including those for the above developments)
- Local agents involved in development within Babergh and Mid Suffolk
- All Parish and Town Councils and any Neighbourhood Forums within the two Districts
- > Persons who are resident or carrying on a business in the area
- Voluntary bodies some or all of whose activities benefit the charging authority's area.
- Bodies which represent the interests of persons carrying on business in the charging authority's area
- Suffolk County Council, Essex County Council and Norfolk County Council
- West Suffolk, East Suffolk, and Ipswich Borough Council
- Breckland, South Norfolk, Tendring, and Braintree District Councils and Colchester Borough Council
- Consideration of all representations and submission of the Councils' proposals with published modifications (or without) to the Planning Inspectorate requesting an Examination in public with an Inspector (late Summer/early Autumn 2025).
- Setting up and carrying out an examination in public (Autumn/early Winter 2025)
- Submission of Inspectors' findings to both Councils and their consideration of any modifications (Winter 2025 /early Spring 2026).



• Submission of the Councils intended revised CIL rates to both Councils for formal consideration and adoption together with revised adopted CIL charging schedules (Spring 2026)

When is it due to start? (Planned start of new/revised policy/service)

Formal consideration of these revised CIL rates occurs at full Council for Mid Suffolk at their meetings in March (Mid Suffolk on 19th March 2025 and Babergh on 20th March 2025). This follows early sharing of the Councils viability report with a presentation by the Councils Viability Consultants (with Client-side panel (the Councils' regular developer's agents and Planning Consultants) on 12th February 2025.

Any other relevant details

(see accompanying Council report on the revised CIL rate charges)

Data about the population

What is the demographic profile or make up of the community you are serving? (A brief overview of quantitative data used and qualitative research undertaken, including customer surveys and focus groups, plus links to reports, local or national data that you have used, suggested sources of information can be found at the end of this document)

<u>Age</u>



The above chart shows the estimated percentage of the population by five-year-age group for Babergh and Mid Suffolk, using data reported in the 2021 Census. The graph shows that for both districts the biggest age groups by population are aged between 45–49 & 70–74 years. This highlights that both districts have an ageing population.





The above graph compares the percentage population of each age group in Babergh and Mid Suffolk with those of the Suffolk and England. When compared with County and National levels, Babergh and Mid Suffolk have a higher percentage of people aged between 50-54 and 80 and over, than the percentages for both Suffolk and England and a lower percentage of people aged between 0-4 and 40-44 years than both Suffolk and England (the exception is people aged between 15 & 19 years, as the percentage of people in this age group, living in Babergh and Mid Suffolk is the same as the figure for the county). This shows that Babergh and Mid Suffolk have a greater aging population when compared both Countywide and Nationally.

What is the profile or make up of your service users by protected characteristics? (Where this data is available. If it is not currently available state any plans to collect this in future)



The above graph shows the percentage of the population in Babergh and Mid Suffolk that are/are not affected by a disability (Definition: People who assessed their day-to-day activities as limited by long-term physical or mental health conditions or illnesses are considered disabled), in undertaking day-to-day activities. The data provided by the 2021 Census shows that the number of people 'Limited a Lot' by a disability is lower in Babergh



and Mid Suffolk, when compared to the county, region and national levels. However, the number of people reporting that they have a 'Long Term Condition', is higher than the rest of the rest of the country. This is possibly due to age of the population in Babergh and Mid Suffolk, when compared to the rest of the country and nationally.

<u>Sex</u>

Population Estimates





The above charts show the estimated percentage of the female and male population by age group for Babergh & Mid Suffolk, compared with the county, region and country. The data shows that between the ages of 0-4 & 25-29, there are slightly higher number of males than females living within the districts. However, between the ages of 65-69 and 90+, there are more females than males living in the districts.

Gender Reassignment

Due to confidentially, detailed local data is not currently available.





Due to confidentially, detailed local data is not currently available.

Ethnicity







Rural areas and hub towns
Babergh & Mid Suffolk

Urban areas

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Rural areas

The above chart shows the percentages of people in living in rural and urban areas, in Babergh & Mid Suffolk; compared to the rest of Suffolk. (*The 2011 Rural-Urban Classification defines areas as rural if they are outside settlements with more than 10,000 resident population, and as urban if inside such settlements. Hub towns are settlements with a population of between 10,000 and 30,000 people*).

The data shows that more people in Babergh and Mid Suffolk live in areas defined as 'Rural' and 'Rural Areas and Hub Towns', compared to the rest of Suffolk. This highlights the rurality of both districts.





The above graphs show the percentage of the population that have served in the armed forces and compares the percentages of people living in Babergh & Mid Suffolk, with the rest of Suffolk and England. The 2021 census data shows that when compared with Babergh, Suffolk and England, Mid Suffolk has a higher percentage of residents who have served in the armed forces.

Implications for communities and workforce	
Disability	
What is the impact on people with a disability (including children with additional	The funds raised by CIL charges can be used to help deliver infrastructure to improve accessibility and other benefits for residents with disabilities. Enable disabled people to participate in the formal consultation by using



needs) and what evidence do	documentation and means of response to public
you have? (If you do not	consultation are made available online and at all the
believe there is any impact	district's libraries and help-points.
describe why not)	Supporting material about this process will be made
	available on the website which is equipped with 'browse
	aloud' for those with visual impairments. Consideration
	given to font size and design layout. Officers are
	available to explain matters in person, over the telephone
	and via e-mail.
	Targeted promotion of consultation exercises at
	representative groups.
How doos it have a positive or	Infrastructure provision generally has a positive impact
How does it have a positive or	on all existing members of the community together with
negative impact?	those new occupants of the new residential development
	the CIL charges are attributed to.
What could be done to	Listening actively to any feedback and making
mitigate any adverse impact	amendments to address any negative or adverse impacts
or further promote positive	together with positively addressing any positive feedback
impact?	with further promotion or suggestions.
Age	
What is the impact on people	The age protected characteristic includes the
of different ages and what	consideration of all ages in society, the assessment of
evidence do you have? (If you	which recognises that vulnerability can change across
do not believe there is any	age groups and the impact of infrastructure provision
impact describe why not)	will not necessarily be uniform across all ages.
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	The age range of both Districts has an aging demographic as evidenced above. Older people can have mobility issues and find it difficult to access public transport (whose levels of provision are low in both Districts) because of the rural nature of both Districts with only 5 market towns and 193 other rural parishes. This can mean that the elderly (particularly if they do not drive)find transport, all other infrastructure services and facilities(including Rail, Health hubs, shops, post offices banks, pharmacies, libraries community facilities) difficult to access.
How does it have a positive or negative impact?	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this protected characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL) alongside new housing growth.



What could be done to mitigate any adverse impact or further promote positive impact?	A decision about collecting CIL is made after the grant of planning permission and using the adopted CIL charging schedules. However, through that planning process and through the development of a strategic planning policy framework, each Council produces an Infrastructure delivery plan which states which infrastructure projects are critical, essential and desirable within both Districts. Through both of these means projects to mitigate harm from development by using CII and other funding streams are developed and delivered which benefit all sectors of both Districts communities. The delivery of such projects are the subject of collaborative work with all the Councils Infrastructure providers (including Rail, Integrated Care Boards, Suffolk County Council (Education Early years Send libraries and waste) Those collaborative discussions can mitigate matters which arise and need to be addressed. By listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.
Sex (gender)	
What is the impact on people of different genders and what evidence do you have? (If you do not believe there is any impact describe why not)	It is not considered that there are any specific requirements for these groups. It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision is all inclusive in respect of the benefits enjoyed by the community as a whole.
How does it have a positive or negative impact?	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this protected characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.



Gender reassignment	
What is the impact on people who have undergone gender reassignment (i.e.	It is not considered that there are any specific requirements for these groups
transgender people) and what evidence do you have? (If you do not believe there is any impact describe why not)	It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision is all inclusive in respect of the benefits enjoyed by the community as a whole.
How does it have a positive or negative impact?	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.
Marriage/civil partnership	
What is the impact on people who are married or in a civil partnership and what	It is not considered that there are any specific requirements for these groups
evidence do you have? (If you do not believe there is any impact describe why not)	It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision is all inclusive in respect of the benefits enjoyed by the community as a whole.
How does it have a positive or negative impact?	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.



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Pregnancy/maternity	
What is the impact on people who are pregnant women or those with a young child and what evidence do you have? (If you do not believe there is any impact describe why not)	It is not considered that there are any specific requirements for these groups It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision is all inclusive in respect of the benefits enjoyed by the
How does it have a positive or negative impact?	community as a whole.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.
Race	
What is the impact on people from different races or ethnic groups and what evidence do you have? (If you do not believe there is any impact describe why not)	It is not considered that there are any specific requirements for these groups. It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision is all inclusive in respect of the benefits enjoyed by the community as a whole.
How does it have a positive or negative impact?	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.
Sexual orientation	
What is the impact on people according to their sexual orientation and what evidence do you have? (If you do not believe there is any impact describe why not)	It is not considered that there are any specific requirements for these groups It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision



	is all inclusive in respect of the benefits enjoyed by the community as a whole
How does it have a positive or negative impact?	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.
Religion/belief	
What is the impact on people according to their religion or belief and what evidence do you have? (If you do not believe there is any impact describe why not)	It is not considered that there are any specific requirements for these groups It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision is all pervasive in respect of the benefits enjoyed by the community as a whole
How does it have a positive or negative impact?	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.

Rurality	
Where people live is not a characteristic protected by law: but for Babergh and Mid Suffolk	
District Councils it is good practice to consider carefully how location may affect people's	
experience of a policy or service.	
What is the impact on people	The character of the Babergh District and Mid Suffolk
according to whether they live	District is rural with only 5 market towns (and Town



in an urban or rural environment and what evidence do you have? (If you do not believe there is any impact describe why not)	Councils) and 193 other Parishes (the majority of which have Parish Councils although there are a number of Parish meetings (which in the case of CIL collection the District Councils retain the CIL and work with Parish meetings to spend their Neighbourhood CIL on projects of their devising)
	All new housing growth whether individually or cumulatively has an impact on infrastructure provision. Culminative impact is a very important consideration as it is the sum total of many developments that may require a school extension early years provision improvements to Libraries. Where this relates to a District wide need for a service like Household waste recycling locations have to be selected for the collective benefit of the District but accessibility highway consideration play a part in overall decision making.
Is the impact positive or negative? <i>(Explain)</i>	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.

Armed Forces Veterans	
help to integrate the armed force statutory services (such as Heat	Forces Covenant which aims to encourage activities which es community into local life. Together, Local Government, alth, police and the Job Centre), and charities shared aims d support to Armed Forces people and their families.
What is the impact on veterans? (<i>If you do not</i> <i>believe there is any impact</i> <i>describe why not</i>)	It is not considered that there are any specific requirements for these groups It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided and the nature of its provision is all inclusive in respect of the benefits enjoyed by the community as a whole



Is the impact positive or negative? <i>(Explain)</i>	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.

Neurodiversity Neurodiversity refers to the different ways the brain can work and take in information. It includes conditions like ADHD, autism, dyslexia and dyspraxia.	
What is the impact on neurodivergent people? (If you do not believe there is any impact describe why not)	
Is the impact positive or negative? <i>(Explain)</i>	Providing infrastructure alongside new housing growth is regarded as generally positive for all but due to the rural nature of both Districts, it is important that infrastructure provision respects this locality characteristic and community led infrastructure projects (i.e. those provided by their community, Town or Parish Councils or by charities or local organisations) in the immediate locality are fully supported through all the different ways of providing infrastructure (such as CIL and Neighbourhood CIL) alongside new housing growth.
What could be done to mitigate any adverse impact or further promote positive impact?	Listening actively to any feedback and making amendments to address any negative or adverse impacts together with positively addressing any positive feedback with further promotion or suggestions.

Making Decisions		
Having completed this equality impact assessment indicate which decision is recommended to be taken.		
Should the policy or service be implemented as the correct course of action?	Yes - the revised draft charging schedules for both Councils should be taken forward for consideration by both Councils with a recommendation that both Councils carry out a 6 week Consultation and proceed in	



Should the policy or service be amended as suggested by the report so that mitigating actions are taken to address an adverse or negative impact on any characteristic?	accordance with the steps and the timescales proposed in this EIA. No – there are no suggestions following this EIA to address any adverse or negative impact on any characteristics
Should the policy or service be reviewed and revised more significantly to take into account its impact on different groups?	No - the revisions to the existing CIL rates have been assessed by the Councils Viability Consultants. The proposed series of revised charges have been assessed to determine their viability affordability to the development industry and determined as acceptable
Should the policy or service not be actioned as there are too many negative impacts?	No - there are real benefits for the community of both Districts as a whole to the collection of revised (and increased CIL rates) as more CIL monies will be collected and ultimately spent on infrastructure for the benefit of the residents of both Districts.

Monitoring Impact			
e	Assessing the impact on equality is an ongoing process that does not end once a policy		
or service had been agreed or implemented.			
How frequently will the policy or service be reviewed?	Each formal stage of the process set out above where a decision will be required by the Councils will be assessed and where appropriate will be accompanied by an EIA assessment		
Who will be involved?	Officers of the Council leading the process, any programme Manager (s) for the process and those responsible for scrutiny of EIA assessments		
Will there need to be an action plan completed for any amendments?	Each formal stage of this revised CIL rates process will be mapped and tracked by Programme Managers and those Officers responsible for leading this proposal through formal processes. This will take account of any amendments that need to occur throughout the process and any action plan for the process		
What further evidence or consultation will be needed to check that the policy or service is working well?	The CIL service is at any time subject to internal or external audit checks or reviews regarding its CIL collection expenditure or debt recovery actions and processes.		
	The Councils has also been subject to review by both Councils joint Overview and Scrutiny Committee on two separate occasions since 2018. This could again occur at any time.		



r c f	This process for the revision of the Councils CIL rates is subject to formal Examination in public by an Inspector responsible for the determination of the Councils request. Should the Inspectors findings include any Modifications for the Council to consider, these will be considered and presented to both Councils formal full Council meetings and for adoption of new CIL charging schedules for both Councils.
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Completion	
Authors signature	Christine Thurlow
Date of completion	10 th February 2025