

SOCIAL AND HEALTH IMPACT ASSESSMENT GUIDELINES for Pilot

Introduction

The term Social and Health Impact Assessment refers to a framework for considering how a new development proposal, policy or plan may impact on the health and wellbeing of the people of Wollondilly.

These impacts can include changes to one or more of the following¹:

- way of life, including:
 - how they live, their access to housing and transport
 - how they work, their access to employment, working conditions and/or practices
 - how they play, their access to recreation opportunities
 - how they interact with one another on a daily basis
- community, including its composition, cohesion, character, how it functions and sense of place
- access to and use of infrastructure, services and facilities, whether provided by local, state, or federal governments, or by for-profit or not-for-profit organisations or volunteer groups
- culture, including shared beliefs, customs, values and stories, and connections to land, places, and buildings (including Aboriginal culture and connection to country)
- health and wellbeing, including physical and mental health
- surroundings, including access to and use of ecosystem services, public safety and security, access to and use of the natural and built environment, and its aesthetic value and/or amenity
- personal and property rights, including whether their economic livelihoods are affected, and whether they experience personal disadvantage or have their civil liberties affected
- decision-making systems, particularly the extent to which they can have a say in decisions that affect their lives, and have access to complaint, remedy and grievance mechanisms
- fears and aspirations related to one or a combination of the above, or about the future of their community.

How the pilot will work

When a development application or planning proposal is submitted to Council that meets the requirements in the table of triggers (listed in Table 1) a Social and Health Impact Assessment comment or comprehensive report must be submitted with the application.

Potential applicants will be informed of this process at any pre-lodgement meeting or as part of duty advice. Potential applicants will be informed of this process at any pre-lodgement meeting or as part of duty planner advice.

¹ Vanclay, F. (2003). *International Principles for Social Impact Assessment. Impact Assessment & Project Appraisal* 21(1): 5-11 Cited in Department of Planning and Environment 2017 'Social impact assessment guideline for State significant mining, petroleum production and extractive industry development <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/social-impact-assessment-guideline-2017-09.pdf>

GUIDELINES

1. SOCIAL AND HEALTH IMPACT ASSESSMENT PROCESS

1.1 Under the Social and Health Impact Assessment policy some types of development applications, planning policies and proposals for change will require a Social and Health Impact Assessment (S&HIA) to be undertaken and submitted with any application. The triggers for this requirement are identified in Table 1.

1.2 In this scheme there are two levels of social and health impact assessment. Depending on the level of impact, applicants must submit one of the following:

Level 1 – Social and Health Impact Comment (SHIC)

Level 2 – Comprehensive Social and Health Impact Report (CSHIR)

1.3 All proposals requiring a Level 1 social and health impact comment must submit a completed Social and Health Impact Comment (SHIC) form (with appropriate supporting documentation). A copy of the form is provided in Appendix A.

1.4 A completed SHIC assessment form will provide an overview of the likely impacts of a proposal and will identify measures to mitigate any negative impacts. If assistance is required to complete this form, then the applicant/proponent must seek the guidance of an appropriately trained professional as detailed in 1.9 of the Guidelines.

1.5 If a proposal is considered to have a moderate or greater level of impact on the community, a CSHIR report will need to be completed.

1.6 Table 1 provides guidance on how to determine what proposals require S&HIA and the level of S&HIA required. Additionally, a CSHIR may be required as a result of the findings of the SHIC or as identified by a Manager within Council.

1.7 Identifying a proposal with a medium to high level of impact can be determined using the criteria listed in Table 1 below or can be identified by the assessing officer once a SHIC has been submitted.

1.8 A CSHIR involves a detailed analysis of potential Social and Health impacts and must be completed by a qualified and experienced professional as detailed in 1.9. Details on what must be included in a CSHIR is provided in Appendix B.

1.9 A CSHIR must be undertaken by a professional experienced in using social and health science methodologies, and where relevant with public involvement. This person must have qualifications in social and/or health sciences and/or planning and must have a demonstrated understanding of applied social and health science research methods.

1.10 A Council staff member may use the SHIC form to identify potential impacts when assessing a development proposal or policy.

1.11 Council may also contract an appropriately trained professional as detailed in 1.9 to prepare a SHIC and/or a CSHIR.

1.12 When a SHIC and/or CSHIR is received in support of a proposal, it will be referred to the SHI internal working group to review and provide comment on. Other staff may also be invited to assist the working group as required and dependant on their area of expertise.

1.13 Council may at its discretion:

- a) seek independent expert advice about specific social and health impact issues relevant to a proposal (meaning a development application, a planning proposal, or a proposed policy);
- b) obtain an independent external review of an applicant’s SHIC and/or CSHIR; or
- c) commission its own SHIC and/or CSHIR.
- d) waive the requirement for SHIC/CSHIR.

1.14 Not all proposals require Social and Health Impact Assessment.

1.15 Proposals that trigger the need for Social and Health Impact Assessment are outlined in Table 1 below.

Table 1: Triggers for Social and Health Impact Assessment (for development applications and land use policy and planning proposals)

Type of development	Type of Social and Health Impact Assessment (S&HIA)* required	
	Social and Health Impact Assessment Comment (SHIC)	Comprehensive Social and Health Impact Assessment Report (SHIR)
Development Applications		
Applications for development of, or major changes to:		
Residential development		
Residential flat buildings greater than 10 units	●	
Residential flat buildings, Multi dwelling housing, Mixed use residential greater than 30 units/dwellings		●
Residential subdivision** between 20 and 100 lots***	●	
Residential subdivision** greater than 100 lots***		●
Affordable housing, within the meaning of SEPP (Affordable Rental Housing) 2009 – excluding secondary dwellings	●	
Development that results in a reduction of affordable housing		●

Housing for seniors or people with a disability, within the meaning of the SEPP (Housing for Seniors or People with a Disability) 2004	•	
Caravan parks	•	
Rural development		
Intensive Plant Agriculture on land less than 4ha	•	
Intensive livestock agriculture (New and additional poultry sheds)	•	
Commercial development		
Entertainment facilities	•	
Amusement centres	•	
Function centres (greater than 100 person capacity)	•	
Retail premises comprising of five or more individual shops and other commercial development for sensitive land uses (unless specified elsewhere)	•	
New or expansion retail premises for the sale of packaged liquor over 500m ² in floor area		•
New or renovations that will increase the floor area or change the layout of Hotels (bars, pubs, taverns), Nightclubs and Registered clubs.		•
Extension of trading hours for licenses premises	•	
New Gaming outlets and any proposal to increase floor space for additional gaming machines.		•
New and expansion of restricted premises (e.g. sex shops)		•
New and expansion of Sex services premises (e.g. brothels)		•
New and expansion of Gun shops		•
Other types of development and proposals		
New Childcare centres (greater than 20 places)	•	
Places of public worship (greater than 100 person capacity)	•	
Educational establishments	•	

Animal boarding and training establishments with 10 animals or more on lots with less than 10 ha land area.	•	
Council-owned community facilities, including community centres, libraries and recreation facilities	•	
Health consulting rooms	•	
New Hospitals	•	
Medical centres and community health services	•	
Methadone Clinics, Safe Injecting Rooms and Primary Needle and Syringe Programs		•
Drug and Alcohol Residential Rehabilitation Accommodation Centre		•
Cemeteries	•	
Designated development		•
Proposals to reclassify Community land, as defined under the Local Government Act 1993	•	
Planning Instruments		
Any changes to strategic land use plans or master plans unless deemed to be of minor impact	•	
Any new neighbourhood plans	•	
Any changes to the LEP which propose reclassification of community land to operational land	•	
Development that will result in the loss of agricultural land within the metropolitan rural areas	•	
Planning Proposals Minor	•	
Planning Proposals Major		•
Planning Proposals Significant		•
<p><i>*If a development has been assessed as being of greater impact by Council then a comprehensive SHI report may be requested, regardless of the table above, at Council's discretion</i></p> <p><i>** This does not include subdivision in the Wilton Growth Area where a Neighbourhood plan has been approved by Council</i></p> <p><i>*** The final total number of lots for a staged subdivision application.</i></p> <p><i>Note: If a CSHIR has been prepared at the planning proposal stage then an updated CSHIR at the development application stage will be accepted.</i></p>		

Council officers may also use the Social and Health Impact Assessment process to guide comments on Social and Health impacts for any of the following types of proposals in the following table.

Additional proposal types that may trigger Social and Health Impact Assessment (S&HIA)		
Type of proposal	Type of Social and Health Impact Assessment (S&HIA) required	
	Social and Health Impact Assessment Comment (SHIC)	Comprehensive Social and Health Impact Assessment Report (SHIR)
Relevant Council policies and plans	•	
State significant development as part of any comments on a SEARS assessment	•	
State significant infrastructure as part of any comments on a SEARS assessment	•	
Regional and District Strategic Plans	•	
Changes to and new State Environmental Planning Policies (relevance determined by content)	•	

2. HOW TO COMPLETE A SOCIAL & HEALTH IMPACT COMMENT (SHIC)

2.1 The SHIC Initial Assessment Form (Appendix A) provides the parameters of social and health impact for the project and forms the basis for all social and health impact assessment.

2.2 The SHIC Initial Assessment Form requires applicants to:

- a) Identify all potential social and health impacts.
- b) Assess whether the impacts are likely to be significant, for each identified social and health impact.
- c) Describe the nature of the impact.
- d) Describe any enhancement measures (for positive impacts) and/or mitigation measures (for negative impacts) proposed to be undertaken.

2.3 Pre-lodgement meetings for development applications and Planning Proposals

2.3.1 It is strongly recommended that the applicant of either a development application or a planning proposal discuss the proposed approach to the SHIC at a pre-lodgement meeting with Council officers

2.4 Applicants can also provide additional information, where relevant, to support or justify their assessment. In completing the SHIC, applicants must provide sufficient information detailing the potential social and health impacts of their proposal. It is not sufficient to state that there will be no impact and thus the questions do not need answering.

3. HOW TO COMPLETE A COMPREHENSIVE SOCIAL & HEALTH IMPACT REPORT (CSHIR)

3.1 A CSHIR is an in-depth assessment of the potential social and health impacts of a development proposal. It entails:

- a) A detailed analysis of the issues already identified in the SHIC Initial Assessment
- b) An outline of the methodology used to conduct the CSHIR
- c) An outline of the research undertaken (including communication and consultation with the impacted communities and key stakeholders)

3.2 The applicant should seek a meeting with Council officers early in the process to discuss Council's specific requirements.

3.3 When is a social and health impact significant?

3.3.1 The assessment of significance applies to the development application (or other change event) as submitted (that is, prior to the application of mitigating measures to reduce identified impacts). A model to guide the determination of 'significance' of social and health impacts is provided in the SHIC Preliminary Assessment Form at Appendix A.

3.4 What types of impacts should be considered?

3.4.1 The CSHIR Report will more comprehensively address the impacts listed in Appendix B (these are also identified in the SHIC Initial Assessment Form) in greater detail as well as any other impacts that have been identified through the additional research and preparation for the CSHIR.

3.4.2 The CSHIR Report will need to address the following types of impacts:

- a) Direct and indirect impacts;
- b) Temporary (e.g. during construction or during consultation) and permanent (e.g. post-construction or post-rezoning) impacts;
- c) The potential for cumulative impacts; and
- d) The significance of potential impacts

3.4.3 The type and amount of information required for the CSHIR report depends on the types of impacts, the significance of those impacts and the potential measures (if any) needed to enhance or mitigate them. The criteria for preparing a CSHIR report is provided at Appendix B.

3.5 Impact Mitigation Measures

3.5.1 Council has an expectation that applicants will propose effective impact mitigation measures. Council will not accept proposed mitigations which will not be deliverable by the applicant. Any mitigation proposed must meet the following criteria:

- a) Tangible – real, substantial, definite and capable of being assigned a value in monetary terms;
- b) Deliverable – something that can be done or realistically expected;
- c) Likely to be durably effective – longer-term lasting impact; and
- d) Directly related to the impact that is to be mitigated.

3.5.2 Adequate mitigations

a) Where social and health impacts are assessed to be moderately to significantly adverse to community and proposed mitigations cannot adequately reduce the likely impacts, the advisory group will recommend that an application or proposal does not adequately provide or will not adequately result in a positive social or healthy outcome.

3.5.3 Inadequate mitigations

Below are some examples of mitigations considered inadequate because they are not tangible, deliverable, likely to be durably effective, or directly related to the impact to be mitigated.

- a) One-off donations to community groups
- b) Proposed additional public transport services
- c) Proposed education programs
- d) Consideration of local residents for employment opportunities

3.5.4 Applicants should ensure that the CSHIR is undertaken by an appropriately trained professional. Information to assist applicants to select a suitable person to undertake social and health impact assessment (SHIC and/or a CSHIR) is detailed in 1.8 of the Guidelines.

3.6 Data Sources

3.6.1 There are numerous data sources that can assist with the SIA preparation process. Refer to Appendix G for a listing of data sources you may wish to use.

3.7 Pre-lodgement meetings

2.7.1 It is strongly recommended that the applicant of a development application discuss the proposed approach to conduct the CSHIR at a pre-lodgement meeting with Council officers.

2.3 Applicants can also provide additional information, where relevant, to support or justify their assessment. In completing the CSHIR, applicants must provide sufficient information detailing the potential social and health impacts of their proposal. It is not sufficient to state that there will be no impact therefore the questions do not need answering.

2.3.2 It is strongly recommended that the proponent for a planning proposal discuss the proposed approach to conduct the SHI at a pre lodgement meeting with Council officers as early input has the potential to reduce the need for further mitigation strategies as the proposal progresses.

4. COMMUNITY CONSULTATION

4.1 Community engagement must be meaningful and take place at a reasonable period of time before a development application is submitted to Council. Affected communities have an important role to play in discussing the potential impacts of a development and identifying measures to enhance positive impacts or mitigate negative impacts.

4.2 Community engagement must be in accordance with the principles and objectives outlined in the Wollondilly Community Participation Plan.

5. WHAT HAPPENS AFTER A SOCIAL AND HEALTH IMPACT ASSESSMENT IS SUBMITTED?

5.1 Assessment

The S&HIA Policy Working Group will review and assess the social and health impact assessment documentation that is submitted, giving regard to evidence of community input, the breadth of social and health impacts considered and the adequacy of the mitigation measures proposed.

After Council officers have assessed the submitted social and health impact assessment, along with any independent advice sought by Council, they may require further information to be submitted in support for the assessment.

Once sufficient information has been provided, Council officers will provide recommendations to the assessing officer which may include recommended conditions of consent or in the case of a planning proposal may result in the creation of site specific development controls for the site.

5.2 Compliance

5.2.1 Any conditions of consent relating to social and health will be monitored as part of any development consent unless specifically identified.

5.2.2 Compliance with proposed mitigation measures at the planning proposal stage will be monitored through site specific development controls if applicable.

APPENDIX A SOCIAL AND HEALTH IMPACT COMMENT ASSESSMENT FORM

Instructions for completing this form:

Applicants of developments and planning proposals where social and health impact assessment is required must complete this form.

The completed form should either be provided to Council with any pre-lodgement meeting documentation (if applicable) or included with the development application (unless it has been determined that a CSHIR report is required and is submitted with the development application instead).

1. Determining Level of impact study required

Assessment criteria	IMPACT			
	Neutral (neither positive or negative)	Minor (positive or negative)	Moderate (positive or negative)	Significant (positive or negative)
Degree of change likely to arise from development relative to existing circumstances	Insignificant / No change	Some change, low significance	Some change, moderate significance	High level of change
The number and nature of people affected	None	Immediate neighbours only (small number)	Suburb level impact (100+ people)	LGA wide impact, substantial impact on a large number of people / groups
Direct or indirect impact	No impact	Indirect impact	Some direct impact	Direct impact
Duration of impact	N/A	During construction phase only	1-12 months	12 months or more
Community perception that a development will cause significant negative social impacts	None	Low level of reaction from the people affected	Moderate level of reaction from the people affected and/or wider community	High level reaction from the people affected and/or wider community
Potential cumulative impacts	Insignificant / None	Low likelihood of increase in overall impacts in the locality	Moderate likelihood of increase in overall impacts in the locality	High likelihood of increase in overall impacts in the locality
SHI Requirement	No further action	Social and Health Impact Assessment	Comprehensive Social and Health Impact	Comprehensive Social and Health Impact

		Comment required	Assessment Report Required	Assessment Report Required
Outcome:				

Outcome:

2. Assessment of Impacts

1. Briefly describe how your development impacts on the local area including the extent of impact.																		
Positive impacts:																		
Negative impacts:																		
2. Consultation																		
2.1 Please provide details of any consultation you have carried out with the community situated near the proposal site (for example, local residents, community organisations, businesses):																		
2.2 Please provide details of any issues raised during consultation and a response to each issue:																		
<table border="1"> <thead> <tr> <th>Issue Raised</th> <th>Response to issue</th> </tr> </thead> <tbody> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> </tbody> </table>	Issue Raised	Response to issue																
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3. Impacts																		

3.1. Population change	
Will the development result in significant change/s to the local area's population (either permanently and/or temporarily)?	
Yes <input type="checkbox"/>	<p>If yes, briefly describe how the development will impact on population change below</p> <p>Positive impacts:</p> <p>Negative impacts:</p> <p>Describe the proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts resulting from population change:</p>
No <input type="checkbox"/>	
3.2. Housing	
Will the proposal result in an increase or a reduction in housing diversity in the locality/and/or Shire?	
Yes <input type="checkbox"/>	<p>If yes, briefly describe how the development will impact on housing diversity below</p> <p>Positive impacts:</p> <p>Negative impacts:</p> <p>Describe the proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on housing diversity:</p>
No <input type="checkbox"/>	
3.3. Accessibility	
Will the development improve or reduce physical access to and from places, spaces and transport?	
Yes <input type="checkbox"/>	<p>If yes, briefly describe how the development will impact on physical access below:</p> <p>Positive impacts:</p>
No <input type="checkbox"/>	

	Negative impacts:	
	Describe the proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on physical access:	
3.4. Community and Recreation Services / Facilities		
Will the development increase, decrease or change the demand or need for community, cultural and recreation services and facilities?		
Yes <input type="checkbox"/>	If yes, briefly describe how the development will impact on the demand for community and recreation services and/or facilities.	
No <input type="checkbox"/>		
		Positive impacts:
		Negative impacts:
	Describe the proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on community and recreation services and/or facilities:	
3.5. Cultural and Community Significance		
Is the development likely to impact on any items or places of cultural or community significance?		
Yes <input type="checkbox"/>	If yes, briefly describe how the development will impact on items or places of cultural or community significance.	
No <input type="checkbox"/>		
		Positive impacts:
	Negative impacts:	

		Describe the proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on items or places of cultural or community significance:
3.6. Community Identity and Sense of Belonging		
Is the development likely to increase or decrease opportunities social interaction or impact on community identity within and between communities?		
Yes <input type="checkbox"/>		If yes, briefly describe how the development will impact on community identity and/or a sense of belonging in the locality/Shire.
No <input type="checkbox"/>		Positive impacts:
		Negative impacts:
		Describe the proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on community identity and/or a sense of belonging:
3.7. Health and Well-being		
Is the development likely to increase or reduce opportunities for healthy lifestyles, healthy pursuits, physical activity and other forms of leisure activity?		
Yes <input type="checkbox"/>		If yes, briefly describe how the development will impact on health and well-being.
No <input type="checkbox"/>		Positive impacts:
		Negative impacts:
		Describe the proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on health and well-being
3.8. Crime and Safety		

Will the development increase or reduce public safety and opportunities for crime (perceived or actual crime)?		
Yes <input type="checkbox"/>	If yes, briefly describe how the development will impact on crime and safety (including perceived) in the locality/Shire.	
No <input type="checkbox"/>		
		Positive impacts:
		Negative impacts:
	Describe your proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on crime and feelings of safety:	
3.9. Local Economy and Employment Opportunities		
Will the development increase or reduce the quantity and/or diversity of local employment opportunities (temporary or permanent)?		
Yes <input type="checkbox"/>	If yes, briefly describe how the development will impact on the local economy and/or employment opportunities.	
No <input type="checkbox"/>		
		Positive impacts:
		Negative impacts:
	Describe your proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on the local economy and/or employment opportunities:	
3.10. Needs of Specific Population Groups		
Will the development impact on specific population groups including an increase or decrease in social, cultural, recreational, employment, governance, transport opportunities?		
Yes <input type="checkbox"/>	If yes, briefly describe how the development will impact on the needs of specific groups in the community (please list these community groups and the impacts specific to these groups).	
No <input type="checkbox"/>		
	Positive impacts:	

		Negative impacts:	
		Describe your proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on the needs of specific population groups:	
3.11. Impact on arts and creative activities			
Will the development impact on existing and/or future arts and creative activities?			
Yes <input type="checkbox"/>		If yes, briefly describe how the development will impact on existing and/or future arts and creative activities in the locality/The Shire	
No <input type="checkbox"/>			
			Positive impacts:
			Negative impacts:
		Describe your proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on arts and creative activities in the locality/Shire:	
3.12. Impact on amenity of place and surroundings (pleasantness)			
Will the development impact on the amenity or enjoyment of the area by the existing/future community?			
Yes <input type="checkbox"/>		If yes, briefly describe how the development will impact on the amenity or enjoyment of the area.	
No <input type="checkbox"/>			
			Positive impacts:
			Negative impacts:
		Describe your proposed measures you will use (which may include social benefits) to avoid, reduce, or mitigate any negative impacts on the amenity or enjoyment of the area:	

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3. Outcome of assessment:

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APPENDIX B GUIDELINES FOR PREPARING A COMPREHENSIVE SOCIAL AND HEALTH IMPACT ASSESSMENT REPORT

A CSHI Report is an in-depth assessment of the potential social and health impacts of a development application or planning proposal. This type of assessment is required when a development is of large enough scale or potential level of impact that it requires detailed consideration of social and health impacts. It involves a detailed analysis of the issues identified in the SHIC and must be completed by a qualified and experienced professional as described in 1.9.

A CSHI report must assess the impacts that a development may have on the surrounding community. A CSHI report is an expansion on the areas of potential impact identified in the SHIC preliminary assessment form and must:

- a. be prepared by a suitably qualified professional (see 1.9)
- b. include input from the affected community
- c. consider and address the following:
 1. Base line data
 2. A full description of the changes proposed.
 3. Examples of similar changes are identified, including impacts likely to affect minority groups, different ages, income and cultural groups and future generations.
 4. Identification of all impacts including direct, long term and short term, positive and negative, passing and accumulating impacts are identified that includes an assessment of the following:
 - Population change
 - Housing
 - Accessibility
 - Community and Recreation Services/Facilities
 - Cultural and Community Significance
 - Community Identity and Sense of Belonging
 - Health and Wellbeing
 - Crime and Safety
 - Local Economy and Employment Opportunities (impacts in regard to this may require a separate economic study)
 - Needs of specific population groups
 - Impact on arts and creative activities
 - Impact on amenity of place and surroundings
 5. Identify the relative equity of impacts. It is important to identify how the benefits and losses will be distributed to different sections of the community.
 6. Consider impacts over time and location are considered (e.g. local as opposed to state and national benefits and losses.)

7. Include impacts which are not measurable as the assessment is an evaluation.
8. A review mechanism where appropriate.
9. Apply the precautionary principle when undertaking the assessment.
10. A full description of the measures proposed to mitigate all negative impacts. These must directly relate to the impact identified.

Please note: A social and health impact assessment may give rise to recommendations for mitigation if the proposed change goes ahead. Like social and health impacts, mitigations should be properly researched to establish their effectiveness in dealing with identified impacts and should address inter - and – intra-generational equity. However, mitigations are not impacts of the proposed change.