

MID SUSSEX DISTRICT COUNCIL

Equalities Assessment

Title of Policy/Service/Contract: Community Infrastructure Levy (Preliminary Draft) Charging Schedule

Division: Planning Policy and Economic Development

Lead Officer: Gareth Giles

Date Assessment completed: December 2011

1. SCOPING

1.1 What are the aims of the policy, service/service change or contract?

To charge, collect and pool funds generated by development to help deliver the infrastructure needed to support growth across the District.

1.2 Who does the service/policy/contract affect? Who are the main customers (internal or external)?

The Community Infrastructure Levy collects planning charges to provide funding for infrastructure in support of new development. This charge, and the infrastructure it provides, has the potential to affect anyone who lives, works or visits Mid Sussex and also those who are outside the administrative boundaries of the District. The charge itself will be levied on new development and therefore affects landowners and developers.

The main customers of the CIL are:

- Members of the public;
- 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;
- Internal customers include those service areas responsible for service and infrastructure provision.

1.3 If your service is likely to use contractors you need to consider whether equality is a core contractual requirement by asking the following questions:

a) is the purpose of the contract to provide services directly to the public and is it considered relevant to equality? N/A

b) Is the provision of Goods, Works or Services in question likely to affect, directly or indirectly, your ability to meet the duty to promote equality?

c) is the contract value £1 million or over? N/A

If the answers to the questions are “no” then equality will not be a core requirement of the contract and will have a low relevance to equality issues.

Assessment of Impact and Needs - Supported with evidence from Data and Consultation

This Equalities Assessment assesses both the **CIL Preliminary Draft Charging Schedule** and the **consultation process**. A Community Involvement Plan, informed by the results of this Assessment, has been produced which details how consultation will be done.

This Assessment will be reviewed, and if necessary revised, for each stage of the CIL Charging Schedule.

Evidence

The supporting evidence to the CIL Preliminary Draft Charging Schedule has been produced through consultation including with Town and Parish Councils, public sector service providers, utilities companies and the development industry. The supporting evidence is principally the Infrastructure Development Plan and the CIL & Affordable Housing Viability Assessment.

- Work commenced on the Mid Sussex CIL in early 2011.
- Town and Parish Councils were consulted in June/July and again in November 2011 and asked to provide details of the key infrastructure improvements or additions needed to support future growth. The consultation was undertaken by letter and email. Responses were included within the Infrastructure Development Plan (IDP) a key piece of evidence for the CIL Charging Schedule.
- Public-sector service providers and utility providers were also engaged to outline their needs and aspirations for future infrastructure provision.
- In preparing the CIL and Affordable Housing Viability Assessment, the consultants hosted a Development Industry Workshop to seek the views of developers, estate agents and registered providers (of affordable housing) on the assumptions and data used to model viability. The consultants also sought the views of commercial developers, Council officers and other data sources throughout the modelling exercise.
- To undertake a more robust assessment of the impact on minority groups of the CIL Charging Schedule, and the infrastructure it is intended to provide, it will be necessary to undertake more targeted consultation with these groups during the preparation of further drafts.
- Clear information about how the money will be spent, where and by whom, will be provided to complement the infrastructure schedules in the Infrastructure Development Plan

2. Assessment of Impact and Needs - Supported with evidence from Data and Consultation

The first stage of the CIL process is to set a Charging Schedule to collect and pool developer contributions in order to deliver infrastructure to support development. The setting of the Charging Schedule requires two consultation exercises. The Charging Schedule is informed by an Infrastructure Development Plan (IDP) which lists the infrastructure needed to support growth and what could be funded with CIL revenues. This distinct separate document should also be consulted on to ensure the specific needs of all groups identified below are taken into account when compiling the list. All potential customers, residents or users of the future development should be involved in setting the priorities in due course for spending the CIL revenues on infrastructure identified in the IDP.

	Opportunity to promote equality and/or barriers to service/differential impact	Evidence base	Current actions taken to address these	Further actions required
Race	<p>The consultation process should:</p> <ul style="list-style-type: none"> -Give adequate consideration to engaging the travelling community to ensure that they can positively input into decision making at Council. -Note potential barriers exist for those for whom English is a second language. 	<p>Engagement with representatives of the travelling community has been limited in past consultations.</p> <p>Community Profiling has indicated potential for groups for whom English is a second language. However, from the data provided by Community Profiling, these groups are not significant enough to justify work on providing documentation in alternative languages as a matter of course.</p>	<p>Letters sent to representative organisations.</p> <p>A translation service is provided by the Council.</p>	<p>Liase with representative organisations for the travelling community to ensure that they have the opportunity to input into the consultation process.</p>
Disability	<p>The funds raised by CIL charges can be used to help deliver infrastructure to improve accessibility and other benefits for residents with disabilities.</p> <p>The consultation process on the CIL should ensure that engagement methods are accessible to those with a physical disability or a mental impairment to ensure that disability is not a barrier to engagement.</p>	<p>Consultation will include Accessibility Action groups.</p>	<p>Letters sent to representative organisations.</p> <p>Consideration given to font size and design in the drafting of the document and large font format is available on request.</p> <p>Terminology used explained in the clearest possible terms.</p> <p>Documents written in plain English.</p> <p>Officers are available to explain the process in person, over the phone and via email.</p>	<p>The CIL document will be made available at all the district's libraries and help-points which are fully accessible.</p>

<p>Age</p>	<p>The funds raised by CIL charges can be used to help deliver infrastructure to improve facilities for residents of all ages, as identified in the IDP. These could include youth facilities, community and sports facilities for all age groups and services for the elderly.</p> <p>Adequate consideration should be given to engaging with young and elderly people to ensure that they can positively input into the consultation process.</p>	<p>Representations from young and older age groups are 'traditionally low' during consultation.</p> <p>Inclusion of infrastructure beneficial to a variety of age groups in the IDP.</p>	<p>Letters sent to representative organisations.</p>	
<p>Pregnancy and maternity</p>	<p>The CIL Charging Schedule is not considered to present any barriers affecting Pregnancy and maternity although there is an opportunity to support the District Plan policy framework ensuring the adequate provision and design of infrastructure including health facilities, local services, open spaces, useable public realm and transport infrastructure.</p>	<p>None.</p>	<p>None.</p>	
<p>Religion and Belief</p>	<p>The funds raised by CIL charges can be used to help deliver infrastructure to improve facilities for a broad range of community groups.</p> <p>Adequate consideration should be given to engaging with religious and belief groups to ensure that they can positively input into the consultation process.</p>	<p>The Viability Assessment evidence considered the ability of a wide range of development uses to afford a CIL charge. Development for community and religious use has been assigned a nil rate in the Preliminary Draft Charging Schedule.</p>	<p>Letters sent to representative organisations.</p>	
<p>Gender/ Gender reassignment/ Sexual orientation / Marriage and civil partnership</p>	<p>The CIL Charging Schedule is not considered to present any opportunities or barriers affecting this group.</p>	<p>None</p>	<p>None</p>	

<p>Socio-economic factors</p>	<p>The funds raised by CIL charges can be used to help deliver infrastructure to improve facilities for residents of all socioeconomic backgrounds, as identified in the IDP.</p> <p>Adequate consideration should be given to engaging with people from all backgrounds to ensure that they can positively input into the consultation process.</p>	<p>Evidence from the Indexes of Multiple Deprivation and Community Profiling work indicate wide variations in deprivation within the district.</p> <p>The Viability Assessment evidence considered the ability of a wide range of development uses in different locations to afford a CIL charge. Different economic values across the District were considered.</p> <p>The Viability Assessment makes recommendations on the provision of Affordable Housing</p>	<p>Letters sent to voluntary services and registered providers (of affordable housing).</p> <p>Monitor the affect of Affordable Housing levels on the viable level of CIL charge.</p>	<p>Ongoing liaison with representative groups and local community.</p>
<p>Living in a rural area.</p>	<p>The funds raised by CIL charges can be used to help deliver infrastructure to improve facilities for residents in all parts of the District, including rural areas, as identified in the IDP.</p> <p>The IDP contains chapters for each rural parish and presents opportunities to identify infrastructure for rural communities including appropriately located and accessible community facilities, local services, open spaces, public realm and transport infrastructure.</p>	<p>Engagement with Parish Councils during the initial IDP consultation in June/July 2011.</p> <p>The Viability Assessment examined the ability of development in rural areas to pay a CIL charge.</p>	<p>Liaison with Parish Councils, representative groups and local communities.</p>	<p>Ongoing liaison with Parish Councils, representative groups and local communities.</p> <p>Local Councillors can also raise queries on this group's behalf.</p>

3. ANALYSIS AND ACTION PLANNING

Any gaps in information or provision, opportunities to promote equalities and/or barriers to services identified above need to be translated into SMART targets and recorded here. These actions then need to be incorporated into service plans so that they can be monitored at service level and also as part of a corporate equalities action plan.

Issue	Action/Target	Lead Officer	Deadline	How will impact be measured?
General engagement with all groups.	Ensure methods publicising the consultation process in the Community Involvement Plan will engage with the widest possible reach of people, for instance by targeting engagement to a wide range of community representatives.	Planning Policy	To be updated when timetable for preparation of CIL & District Plan has been agreed	Response monitoring
Accessibility to consultation materials	Materials to be made available on the Council website and at places that are accessible to all groups such as libraries, help points and Parish Council offices. The translation service should be publicised in the Documents.	“	“	Response monitoring
Overall opportunity to ensure adequate funds are collected to enable District Plan to deliver relevant infrastructure.	Adopt a CIL Charging Schedule. Create a comprehensive IDP to justify collection of funds and a delivery mechanism for projects.	“	“	The receipts and expenditure of CIL funds.
Overall opportunity to provide community facilities, local services and other infrastructure, including within the rural areas.	Adopt CIL Charging Schedule to collect charges and provide funds for provision and improvement of community facilities and other infrastructure necessary to support development.	“	“	The receipts and expenditure of CIL funds.
Engaging with the travelling community.	Liaise with representative organisations for the travelling community to ensure that they have the opportunity to input into the consultation process.	“	“	Evidence of involvement by monitoring level of response received from this group.
Potential barriers for those for whom English is a second language.	Ensure translation service logo in a prominent place in CIL documents and on the website.	“	“	Evidence of involvement by monitoring level of response received from this group.
Opportunity for CIL funds to provide accessibility and other benefits to disabled residents.	Include appropriate infrastructure in IDP.	“	“	Review the content of IDP.

Opportunity for CIL funds to provide facilities and other infrastructure for all age groups.	Ensure engagement with all age groups through targeted consultation and make response forms available on-line and at accessibly locations. Include appropriate infrastructure in IDP.	“	“	Evidence of involvement by monitoring level of response received from this group and the presence of related infrastructure in the IDP.
Opportunity for CIL funds to provide facilities for a broad range of community uses including religious groups.	Ensure engagement with a range of groups through targeted consultation and include appropriate facilities in IDP.	“	“	Evidence of involvement by monitoring level of response received from this group and the presence of related infrastructure in the IDP.
Opportunity to deliver infrastructure to improve facilities for residents of all socio-economic backgrounds	Ensure include appropriate facilities in IDP.	“	“	Review the content of IDP.
Engaging with those who are disadvantaged by their socioeconomic background.	Ensure engagement with a range of groups through targeted consultation.	“	“	Evidence of involvement by monitoring level of response received from this group
Opportunity to enable people to continue to live in their locality, particularly in rural areas.	Liase with rural Parish Councils and rural communities. Ensure appropriate facilities are identified in the IDP.	“	“	Evidence of involvement by monitoring level of response received from this group and the presence of related infrastructure in the IDP.
Potential barrier to engagement is more remote location in rural areas and lack of development generating CIL revenue in rural parishes.	Ensure consultation reaches rural communities through liaison with Parish Councils. Ensure appropriate infrastructure is delivered to support residential development in rural areas. Ensure all consultation materials are available online and contact with officers is possible by telephone and email.	“	“	Evidence of involvement by monitoring level of response received from this group and the presence of related infrastructure in the IDP.

4. Signing off this assessment and action plan

Signature
Person undertaking the assessment

Date

Signature
Head of Service

Date