

Bungendore High School: Review of social impact assessment

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Purpose of this review

State significant projects can affect people in many ways, both positively and negatively. Identifying and understanding social impacts helps to inform responses that aim to avoid, mitigate or reduce negative impacts and enhance positive impacts (SIA Guideline, 2021, p.7). The consent authority is required to consider social impacts in the locality, and to consider the public interest. The public interest includes the object of promoting the social and economic welfare of the community, and the object of ecologically sustainable development, which requires effective integration of social, economic, and environmental considerations in decision-making (*Environmental Planning and Assessment Act 1979 No 203*).

This review evaluates the updated **Social impact assessment (SIA)** report prepared by Urbis, dated 7th September 2021, plus the **SIA Addendum** dated 5th September 2022, also prepared by Urbis, for a proposed new Bungendore High School (SSD-14394209). It also considers the **Amendment report** prepared by mecone, dated September 2022, which in S.6.6 purports to summarise the Urbis SIA material.

The review examines the SIA's consistency with the Secretary's Environmental Assessment Requirements (SEARs) in respect of the SIA process, and comments on the predicted social impacts and proposed responses (mitigation/enhancement).

The review concludes with a short section of formal feedback for proponents and their SIA practitioners to support practice improvement and establish expectations for future SIA quality.

Following any further assessment and/or information, the review authors may provide additional advice on merits, responses, and possible consent conditions.

Review comments

Comment	Recommendation
<p>1. Analysis of alternatives</p> <p>In SIA, there is an expectation that, where more than one reasonably plausible scenario exists, then a comparative analysis should be made of the social impacts of each scenario. (See S.4.8 of the SIA guideline).</p> <p>This may not be necessary where only one reasonably plausible scenario exists, but in the case of this project, there is clearly public discussion of alternative sites on which to locate the facility.</p>	<p>Please undertake further impartial assessment, with clear, comparative analysis of the social impacts (positive and negative) of alternative possible sites, timelines or educational facility approaches, not only of the 'preferred' site.</p>

<p>Serious consideration and analysis of alternative sites, timelines or alternative approaches to address delivery of educational facilities is needed to provide opportunities to avoid some of the significantly negative social impacts, e.g. loss of open space, multiple services, community features and facilities that are highly valued, and to enable evaluation of the relative merits of different sites.</p>	
<p>2. Loss of access and distributive equity</p> <p>The proposed project will benefit some sections of the community (those using the school) at the expense of others (those who will lose access to existing spaces, services, and facilities, either temporarily or permanently depending on future decisions). Importantly, these latter users are likely to comprise the more vulnerable members of the community (although we do not know who those people are from the SIA.)</p> <p>There is inadequate information to properly understand the extent and intensity of the impact of the closure and interim relocation of the community centre, library and council service centre and closure of the pool. However, extensive research supports the importance of community centres, libraries, pools and social services for health, social interaction, social inclusion and livelihoods. The proposal would exacerbate social inequities in the community across all these spheres.</p> <p>The option of 'shared management' of Mick Sherd Oval also would present distributive inequities by potentially placing a disproportionate burden for the maintenance on council ratepayers while primary use is restricted to only a section of the community (school students).</p>	<p>Please propose mitigation measures that avoid further disadvantaging vulnerable groups.</p> <p>The applicant should provide certainty in the community by unconditionally committing to maintaining the swimming pool as operational until the end of March 2023 (i.e., without the caveat of 'unless the proposal is approved sooner').</p> <p>If alternative project approaches cannot avoid these impacts (e.g., timing), or tangible and deliverable mitigations cannot address them, then the residual high significance should be a key consideration in the evaluation of the proposal.</p> <p>Any arrangement for management of Mick Sherd Oval should seek to avoid the risk of cost shifting to Council.</p> <p>The proponent should also reconsider the need for high fencing, since such barriers exacerbate divisions between the socially 'included' and the socially 'excluded'.</p> <p>Ensure that updated mitigations are tangible, deliverable by the proponent, and likely to be durably effective (see p.35 of the SIA guideline).</p>
<p>3. Deliverability of mitigations</p> <p>Loss of existing spaces, services and community facilities would present multiple significant social impacts, some direct (e.g., access to services), and some indirect (e.g., reduced social cohesion, health). Proposed mitigations currently are inadequate. For example, there appears to be no meaningful measure to mitigate the loss of the community centre, a fundamental facility and service that performs multiple social functions.</p> <p>Related to equity impacts, much of the residual social impact seems to rest on when and whether existing spaces, services and community facilities are replaced. To a great extent, this is beyond the sole power of the proponent to deliver. The implication is that</p>	<p>Please either:</p> <p>provide further information to demonstrate how proposed measures can constitute genuine commitments,</p> <p>or:</p> <p>enter into appropriate arrangements with third parties to ensure that impacts will be mitigated as proposed, bringing the residual significance to acceptable levels.</p>

<p>proposed measures do not constitute genuine commitments to the community.</p> <p>Mitigations should be <i>proportionate</i> to the impact and deliverable <i>by the proponent</i>. If they depend on another party, they are by definition not proportionate, nor deliverable.</p> <p>For many impacts the SIA includes both management measures and recommendations. These are not included in the EIS table of mitigations</p>	<p>This might mean, for example, delaying demolition of existing facilities to minimise duration of loss until there is at least more certainty about timeframes for new facilities.</p> <p>Please include all SIA management measures and recommendations in the EIS mitigations table so they can all be subject to DPE assessment.</p>
<p>4. Project social benefit</p> <p>The benefits of improved access to education may appear self-evident, but for SIA purposes require impartial assessment of assumed or claimed benefits.</p> <p>To this end, the SIA needs better quantification (e.g., predicting the likely high school catchment and student population of that area in consideration of population projections, the likely split between public and other schools, modes of travel and travel time for the school in comparison with existing travel for the various destinations).</p> <p>The assessment should consider population forecasts and the capacity of the school to accommodate this growth. Given the spatial constraints of the existing sites, and the enrolment projections referenced in the submission by Save Bungendore Park, the proposal may be unable to accommodate the medium-term need, requiring future expansion. Unless planned for now, this creates further community uncertainty.</p>	<p>Please provide a proportionate analysis based on existing and project future population, public high school education demand and catchments, travel modes and durations and the consequent benefit of the school. This should demonstrate the likely catchment of the school and its capacity to meet future demand.</p> <p>If any future growth of the school is likely to be required, please indicate how this would be met, including achieving access to adequate open space.</p>
<p>5. Social baseline</p> <p>The social baseline does not qualify or quantify the social context relevant to understand the most important social impacts, both positive and negative.</p> <p>The social baseline is expected to provide evidence to understand:</p> <ul style="list-style-type: none"> the current need for the development (e.g., quantifying where and how the current students (who live in what would be the new school catchment) attend school (public and other) and the travel times for the various destinations); the existing operation and use of the social infrastructure impacted (e.g., operating times) and the nature and extent of users (see also below in Community Engagement for more detail on users); any public transport in the social locality and its frequency to inform accessibility of existing schools and social infrastructure and future access; what vulnerable groups exist in the social locality. 	<p>Please update the social baseline to provide these details so that the reader can understand the extent and intensity of social impacts.</p>
<p>6. Community Engagement</p> <p>The social baseline and SIA should include both qualitative and quantitative data sourced through engagement specifically for</p>	<p>Please undertake and document targeted engagement to better</p>

<p>SIA. The SIA apparently relies exclusively on engagement undertaken for the EIS and for project development. The engagement is not adequate to inform the SIA, including in regard to understanding:</p> <ul style="list-style-type: none"> • who uses social infrastructure, how, and how often – including understanding their catchments (i.e., the pool, community centre, casual users of Mick Sherd Oval, library), • how users expect to be affected (including experiencing the benefits), and how they are currently managing the uncertainty; • how users travel to and from the social infrastructure and how any changes in location will affect them; • potential impacts to vulnerable or marginalised users. 	<p>understand the significance of the impacts.</p>
<p>7. Social locality</p> <p>There is some confusion between social locality and area of social influence. According to the SIA guideline, proponents are required to identify and analyse the social locality, which correlates with 'area of social influence' in international guidance (Vanclay et al., 2015). However, the SIA report has separate sections on each of these concepts (4.1 and 4.5).</p> <p>Additionally, neither of these sections determine the spatial extent of the social impacts (e.g. benefits of the school and negative impacts to social infrastructure users), rather the arbitrary suburb and LGA have been adopted to define the extent of the social baseline.</p>	<p>Please update the SIA with a social locality map and justification that illustrates the expected spatial distribution of social impacts.</p> <p>DPE expects that the social locality would consider the current and future school catchments, the user catchments for the pool and community facilities and where the greatest impacts are expected. Please revise the labels and function of each subsection in S.4.</p>
<p>8. Existing impacts of the uncertainty</p> <p>Consistent with a life-cycle approach, the SIA guideline (p.17) requires consideration of <i>"the history of the proposed project and the area, and any similar experiences people in the locality have had, including change prior to, or created by, the project's planning assessment; how people reacted to early discussions..."</i></p> <p>The SIA has not considered the social impacts that are already being experienced in the community, beyond those of Council employees. As the Rocky Hill judgement found, uncertainty is known to be a cause or adverse social impacts in a community. The uncertainty and evolving plans are likely to have significant impact on service providers and users of facilities (pool, library, community centre etc).</p>	<p>Please update the SIA to demonstrate consideration of existing impacts arising during the planning stage, based on primary research.</p> <p>The applicant should guarantee access to the Bungendore Pool and community centres until March 2023, regardless of project approval or decisions of other parties.</p>
<p>9. Aboriginal values</p> <p>The SIA makes some welcome recommendations on strengthening Aboriginal connections and values. These are, however, largely intangible, and would benefit from being complemented by some tangible measures to enhance Aboriginal wellbeing and livelihoods.</p> <p>This would be consistent with Priority Reform 5 in the NSW Closing the Gap Implementation Plan.</p>	<p>Please identify measures to enhance Aboriginal wellbeing and livelihoods through tangible actions, e.g., opportunities for culturally-responsive employment and/or business.</p>

<p>10. Decision-making systems</p> <p>An important category of social impacts is decision-making systems, as noted on p.5 of the SIA but not then analysed. Given the contentiousness of this project, it seems difficult to imagine that there is little concern regarding people's ability to meaningfully participate in decisions that affect them.</p>	<p>Please reconsider this category, assess its significance (including perceived), and propose commensurate responses.</p>
<p>11. Monitoring and Management</p> <p>There is no plan for monitoring and adaptive management of social impacts. While this is not a requirement of all SIAs, it seems reasonable to include this where a project is complex or contentious, to give the community assurance that predicted impacts and delivery of commitments will be monitored.</p> <p>This expectation is also consistent with the SIA principle of being lifecycle-focused. SIA therefore does not necessarily stop with project approval, since ongoing social impacts must be adaptively managed.</p> <p>At this stage, a provisional (draft) plan is adequate, with a final plan being appropriate as a condition of consent.</p> <p>Refer to p.35 of the SIA guideline:</p> <p><i>"Does the SIA report demonstrate how people can be confident that social impacts will be monitored and reported in ways that are reliable, effective and trustworthy?"</i></p> <p><i>"Does the SIA report demonstrate how the proponent will adaptively manage social impacts and respond to unanticipated events, breaches, grievances and non-compliance?"</i></p>	<p>Please provide a provisional plan for monitoring and adaptive management.</p> <p>The plan should include the following monitoring provisions at a minimum:</p> <ul style="list-style-type: none"> • desired outcomes in social terms, including targets where appropriate; • what will be monitored; • how and when data will be collected; • who is primarily responsible for monitoring; • how incidents and grievances will be recorded, reported, and responded to; • how community and other stakeholders can participate in monitoring if they wish.

General feedback for proponents and SIA practitioners

- Determination of an overall project social impact significance or merit in an SIA is not required or appropriate.
- The significance of individual social impacts should be evaluated individually rather than combined with other impacts and assessed as an overall significance of an impact category.
- The relationship between a social impact and its response (mitigation/enhancement) should be clear in an SIA. This may be achieved through tabulation of individual impacts and their correlating responses rather than through general lists.