

Goulburn Mixed Use Development: Social Impact Assessment (SIA)

DPIE internal review

November 2019

Context and approach to this review

This review considers the SIA report for the proposal SSD 9143 in respect of its consistency with requirements to consider social impacts in the SEARs dated 25/7/2018 (amended 7/3/2019). It is noted that the SEARs Attachment 1 included the NSW SIA guideline, although the applicant was not formally required to apply that guideline.

Review comments

1. Table of contents

The table of contents does not match the report, and instead appears to relate to the Consultation Outcomes Report. Please update table of contents.

2. Social baseline

The community profile is too 'high level', and does not identify who might be most directly affected by the project. Please describe and characterise the community neighbouring the project, and identify what they value about their neighbourhood, to inform how the project might affect these values.

Tables 2 and 3 are not referenced or dated, making it impossible to discern how accurate and up-to-date the information is. Please update tables 2 and 3, ensuring the most recent available data are used.

Table 2 misunderstands 'cultural diversity' as 'religious identification'. These may be linked, but are very different concepts. Note also that the data are incomplete; for example, the total for Goulburn SE is only 61.4%. What about the other 38.6%? Please revise and provide complete data as relevant to the likely social impacts.

The 'businesses' section (p.19) mentions a preschool program and childcare centres, but does not comment on the adequacy of the current capacity. This has important implications for the childcare component of the current proposal. Please investigate.

The section on housing and rental (pp.20-21) is speculative rather than analytical, as illustrated by phrases such as "it appears there may be potential rental properties available during construction." Also, it is not clear what is meant by "local businesses could be used to provide temporary accommodation." Please identify what type of local business would supply this need, what evidence there is of adequate capacity, and how this might affect affordability for existing renters.

The 'social infrastructure' section (p.21) omits any mention of health and education facilities, plus social and community facilities and services. It is therefore impossible to evaluate how the project

might affect availability and accessibility these facilities and services. Please provide this information, including some insight into whether facilities and services are currently considered adequate and accessible (from the community's perspective).

The social baseline does not identify any limitations, uncertainties, or assumptions in its data. Please rectify.

3. Assessment

The categorisation of impacts into 'construction', 'operational', and 'opportunity' is unusual and not intuitive, since the first two are time-defined whereas the third is not – opportunities (or positive social impacts) can arise during both construction and operations. Please restructure the assessment.

The assessment section misses an entire part of the SIA methodological process – that is, predicting social impacts through sound social science. It proceeds directly from the social baseline to evaluating significance. It is not possible to evaluate significance – or indeed the likely efficacy of mitigation – without first analysing the likely impacts (through evidence) and predicting how people may experience them. In the absence of evidence-based impact prediction and analysis, the SIA is simply a unilateral, desktop exercise. This makes it difficult for the reader to have confidence in the SIA as a whole. It is noted that Appendix 1 provides more detail, but no sense of how people expect to experience the project, instead making a series of assumptions about likely impact. It is therefore not clear that these are the things that matter most to people, or that they have been evaluated through a social 'lens'. Please provide evidence-based impact prediction and analysis to inform the evaluation of significance and proposed mitigation measures.

The assessment of significance considers probability (likelihood), extent, duration, and severity, but omits the critical variable 'sensitivity'. This is a major omission in SIA as it risks overlooking the experiential nature of impacts, i.e. how people will experience or perceive the project. To consider sensitivity, the SIA should ask: *How sensitive/vulnerable (or how adaptable/resilient) are affected people to the impact, or (for positive impacts) how important is it to them?* This might depend on:

- the value they attach to the matter;
- whether it is rare/unique or replaceable;
- the extent to which it is tied to their identity; and
- their capacity to cope with or adapt to change.

Please revise assessment incorporating primary research to evaluate sensitivity.

The SIA (in the conclusion, p.32) cites job and business opportunities as the only potential positive impact. This is a common error, in which socio-economic impacts are misconstrued as social impacts. The role of the SIA here is to predict and evaluate the likely *social consequences* of job and business opportunities. It is not enough simply to cite job and business opportunities because these describe changes that are primarily *economic* and that *may* have flow-on social impacts. Those social impacts may be:

- positive (e.g. improvements in subjective wellbeing and/or community cohesion);
- negative (e.g. stress on families if people are working long hours or late shifts, loss of livelihood among small businesses that cannot compete with larger employers); or
- neutral (people simply moving from one job to another job with similar conditions).

Please reassess positive social impacts evaluating how the predicted job and business opportunities will translate to social outcomes, positively and/or negatively. Please also consider whether the project offers other positive social impacts that are unrelated to job and business opportunities – for example, whether the project will improve people’s access to services.

4. Mitigation strategies

It is impossible to comment on the likely effectiveness of proposed mitigation measures in the absence of proper assessment of potential impacts. Having revised the assessment as above, please revisit the mitigation strategies to ensure proposed measures respond to predicted impacts. Furthermore, when deriving mitigation measures, please ensure that these measures address the social dimension of impacts (i.e. addressing how people expect to experience the project and its impacts) rather than just undertaking to comply with technical thresholds.

5. Monitoring

There is no monitoring and management framework proposed. Please provide details of how social impacts will be monitored, reviewed, reported on, and adaptively managed over time. This should include opportunities for affected people to participate in monitoring to maximise trust in the data.