

Brandy Hill Expansion Project: Social impacts to consider in a request for Response to Submissions

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Adequacy of social impact assessment

A review of EIS Appendix 17 *Socio-Economic Impact Assessment*, combined with analysis of submissions received in response to the EIS, indicates that the EIS does not enable proper assessment of the potential social impacts. In particular:

1. It does not adequately address the impacts that matter most to people directly affected.
2. It has not been adequately informed by outcomes of community engagement activities.
3. Directly affected community members have not had sufficient opportunity to participate in the social impact assessment process.
4. It is not underpinned by accepted social science methods.
5. Assessment of impact significance has not followed accepted standards for assessing risk and opportunity.
6. Proposed mitigation measures are not obviously commensurate with the potential significance, especially when this includes the level of concern.

Relevant social impacts

The following concerns regarding potential social impacts were identified in submissions and require a commensurate response from the Applicant. Note that many of these impacts have environmental and economic aspects that overlap with the social aspects. Where such overlaps exist, for the purposes of social impact assessment, responses need to address the social aspects of these impacts.

1. Loss of rural amenity and 'liveability' caused by expanded hours of operation and additional truck activity, especially at night time.
2. Loss of sense of place (a quiet, safe, rural environment) caused by expanded hours of operation and additional truck activity.
3. General adverse effects on health and wellbeing (e.g. ability to sleep) caused by expanded hours of operation and additional truck activity.
4. Physical health effects of increased noise, dust, diesel fumes, and particulates caused by expanded hours of operation and additional plant and machinery (e.g., the proposed concrete recycling plant and incoming, fully-laden trucks driving uphill).
5. Adverse effects on access amenity owing to road damage caused by increased truck volumes.
6. Compromised road safety (for other drivers, school buses, cyclists and pedestrians, particularly schoolchildren) and congestion caused by increased truck volumes.
7. Structural damage to private property caused by increase blasting and vibration.

8. Property devaluation caused by expansion of operation, especially for residents on and near Brandy Hill Drive and Seaham Road (i.e., Brandy Hill and Nelson's Plains) and part of Clarence Town Road.
9. Living with legacy and potential toxicity of void if not rehabilitated with solid fill.
10. Cumulative effects of these activities (and those of Martin's Creek Quarry) on amenity and quality of life.
11. Community engagement, and measures to address community concerns, perceived as inadequate/tokenistic.

Recommendation

The following is a suggested wording for any social impact-related component to include in a request for Response to Submissions.

1. The applicant is requested to respond to the potential social impacts identified above, and either propose an adequate mitigation measure for each one, or justify why no mitigation is warranted. Consideration should be given particularly to the various measures put forward by the Brandy Hill & Seaham Action Group (e.g., restricted production and operating hours, construction of shared pathways, road safety measures). Proposed responses should follow the usual hierarchy (first avoid, second minimise, third mitigate).
2. To inform and underpin the proposed responses in item 1, the applicant is requested to undertake a more rigorous assessment of the likely significance of each impact. This assessment of significance should:
 - a. have regard to the likelihood, extent, duration, and severity of each impact;
 - b. have regard to the sensitivity of local receivers (i.e., affected community members), their capacity to adapt to change, and their level of concern;
 - c. involve affected community members in genuine engagement activities as part of undertaking items 2a and 2b.
3. To inform proposed mitigation measures and assess their adequacy, the applicant should again involve relevant community members (i.e., those living nearby who may be affected by the project).
4. Community engagement activities undertaken for this Response to Submissions should be undertaken by a suitably qualified and experienced practitioner(s), and the Applicant should identify the name, qualifications, and experience of any practitioner(s).