Social Impact Assessment Symposium 21/March 2014

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1. The public sector experience

Bio Statement
Tara has a degree in Social and Environmental Science with Class 1 Honours in Environmental Psychology and has worked for state and local government, in academic research and as a consultant in the private sector. In each of these sectors Tara has practiced social impact assessment.

Tara has diverse experience in project management and leadership in community development, community engagement, social and cultural planning, and the delivery of services. Tara has worked in multidisciplinary teams for more than twelve years to provide integrated analysis, advice, strategy and solutions. Tara led the development of the social program of the City of Sydney’s Sustainable Sydney 2030 Strategy, the vision and action plan for Sydney for the next 20 years.

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Summary of key points
In discussing the Public Sector experience of Social Impact Assessment (SIA), I am drawing on my experience reviewing SIAs, as part of development assessment in three local government authorities in NSW over the past 13 years. I am disappointed to report that in my experience in this setting, SIA is not integral to the development process and does not reflect good practice SIA (when compared with the Planning Institute of Australia Social Impact Assessment Policy Principles). This contrasts with my experience of SIA practice outside of development assessment in NSW.

Taking the approach, consistent with Alison’s introduction, that the inclusion of a social scientist in the planning stages is actually social planning rather than SIA, that SIA is a discrete stage of work, I am going to focus on SIA and distinguish it from social planning.

In preparing for the presentation today I have struggled to identify one SIA that has thoroughly analysed and documented impacts and has recommended strong mitigation and enhancement strategies. Why is this?

- SIA is often not viewed by proponents (or other professionals) as integral to development assessment and is still often seen as a ‘tick box’ requirement, undertaken at the end of the process so that development approval is obtained.

- Unfortunately SIA is too frequently undertaken in isolation, separate from Environmental Impact Assessment, Health Impact Assessment etc. Social Impact Practioners are provided
with the defined proposal and asked to prepare an assessment to justify and support the finalised proposal. I suggest that an integrated assessment makes a strong argument and provides a strong platform for mitigation and enhancement strategies.

- SIA Practitioners are engaged by the proponent. This always creates a tension and results in the SIA Practitioner not being an independent assessor or advisor.
- SIA is not always undertaken by a qualified Practitioners, social scientists.
- Within the NSW Planning framework, there are limited opportunities to influence a proposal after the design stage, and there is often limited opportunity to enhance or mitigate social impacts past the design stage. Conditions of consent can be applied however the scope of these is narrow, particularly conditions to address social impacts.

SIA is too often used to justify a proposal rather than critically assess and recommend strategies to avoid or manage and monitor impacts. This is often the case, despite planning frameworks that outline social considerations (such as safety, equity etc), and local government policies that require SIA consistent with good practice principles. Many local government SIA Policies have a tiered approach to SIA, requiring a basic level of assessment and a more robust assessment for major proposals.

The Planning Institute of Australia Social Impact Assessment Policy Principles provide a benchmark for good practice, against these principles I briefly reflect on my experience reviewing SIAs:

**Principle i. The process is undertaken by a competent, professional social scientist and uses rigorous social science methodologies.**
On occasions, SIAs are provided by planners with no social science experience. I suggest that the development assessment framework (including timeframes) constrains the scope for rigorous social science methodologies.

**Principle ii. The process includes effective, timely and transparent public involvement.**
Social Impact Practitioners are also often not given scope to incorporate meaningful community and stakeholder engagement. The engagement relied on to inform the SIA, if any, is broad consultation on planning policies rather that proposal (and site) specific engagement. The notification process, the required opportunity for public participation, occurs after the SIA has been completed, when the development application has been lodged.

**Principle iii. The baseline (pre-change) situation is adequately researched and documented.**
Rarely, often SIAs focus on the proposal only and do not reference the baseline or options.

**Principle iv. The scope of proposed changes is fully described.**
Rarely, often SIAs summaries the proposed changes and rely on other documentation to describe the proposed changes.

**Principle v. Examples of similar changes are identified, including impacts likely to affect minority groups, different age, income and cultural groups and future generations.**
Statistics on minority groups are sometimes included but the impacts on these groups are rarely discussed. I have not seen a SIA consider impacts on future generations or intergenerational equity.
Principles vi. Direct as well as indirect, long term and short term, positive and negative, passing and accumulating impacts are identified; and viii. Impacts over time and location are considered (e.g. local as opposed to state and national benefits and losses.)

Rarely, often SIAs address only short term, site specific impacts and focus on positive impacts while dismissing negative impacts. Cumulative impacts are very rarely considered.

Principle vii. The relative equity of impacts is identified. It is important to identify how the benefits and losses will be distributed to different sections of the community.

Rarely, in fact I recall a SIA to accompany a development application for child care centre with more than 200 places that stated ‘There is nothing about the proposed child care centre development on the subject site that would result in any change to social equity in the x area’!

I have not seen an SIA (accompanying a development application in NSW) that applies the following three policy principles:

- ix. Impacts which are not amendable to precise measurement are not excluded from consideration – the assessment is and evaluation not a proof.
- x. A review mechanism is included where appropriate.
- xi. The precautionary principle is applied in making an assessment.

SIAs too often simply describe the proposal, describe the site and social environment (using ABS Census of Population and Housing data) and then state that impacts will be minimal or non-existent and fail to identify and mitigation or enhancement strategies.

An example of good practice:

I would like to reference one example of good SIA practice, however this also involves social planning at the design stage. It relates to a large scale multi-use development in the Green Square area. The social planning and SIA was undertaken by a competent, professional social scientist and used rigorous social science methodologies (including a needs analysis). There was not a clear boundary between the social planning and SIA. This example involved the Social Impact Practitioner as part of the team developing and designing the proposal and then preparing the SIA. As a result, the proposal incorporated new social infrastructure, a long day care centre. The SIA documentation submitted with the DA included an analysis of the baseline situation and an understanding of the impacts over time and location. In this case the SIA was also supported by a Child Care Centre DCP and a Child Care Needs Assessment that had been undertaken by the Council.

An example of good social planning practice:

The contribution of social planning to the redevelopment of Harold Park is a strong example of the outcomes that social planning can achieve. The Harold Park urban renewal project is in Forest Lodge, near Glebe and Annandale. NSW Harness Racing Club owned the Harold Park Paceway since 1911. In 2011 the City of Sydney developed the planning controls for the site, following extensive consultation with the local community to balance the interests of residents, businesses and the land owners, and the need to meet targets for new inner-city housing.

- The $1.1 billion project includes 1,250 new residences that will be home to around 2,500 people.
- Homes will be close to light rail, new parks and nearly 2 kilometres of walking and cycling paths will connect Harold Park to the surrounding area.
- The former Rozelle tram depot will be conserved and higher sustainability targets mean new homes will use less energy and water.
- The developer is required to dedicate 1,000 square metres of land for affordable housing and 500 square metres within the tram sheds for community use.
The developer is required to dedicate more than one-third of the site to the City for a public park – 3.8 hectares of previously private space will become open public space.

If there had been no social planning contribution to the development of the planning controls, only a social impact assessment undertaken after they were developed, I suggest that the equivalent social outcomes would not have been achieved. Social planning as an integrated part of the planning and design stages is effective and efficient. I suggest that one of the key opportunities to deliver social outcomes is when social planning Practitioners are part of the multidisciplinary team that shapes and defines the planning controls or proposal.

Questions to prompt debate on how can improve SIA within the NSW Planning Framework:

- How do we address the tension that the SIA Practitioners are not an independent assessors or advisors (they are engaged by the proponent)?
  (note talking with colleagues in development assessment, other professional areas experience the same tension and resulting poor quality impact assessment, for example heritage impact assessment).
- How can we improve the quality of SIAs submitted to accompany DAs?
- How can we provide a valued space at the planning stage and the design table for social planners? If this is achieved would SIAs be required?
- Does the tiered approach deliver better social outcomes? Should we only require SIAs for ‘major’ proposals and ensure these comply with good practice?
- How can we strengthen our planning controls, particularly DCPs to address social considerations?
- Is the current level of public involvement, community engagement in SIA adequate?
- Who’s responsibility is it to address cumulative impacts, consider equity and long term impacts, and to apply the precautionary principle?
2. Ethics in Social Impact Assessment

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Summary of key points
Early in my career I was fortunate to have the opportunity to work with Kuku Yalanji, Mossman Gorge Aboriginal community when working as a research officer for James Cook University and the Cooperative Research Centre for Tropical Rainforest Ecology and Management. I learnt much from these experiences, both personally and professionally. Before working with the community to develop the big picture plan, Bama Bubu Nganjin Djuma Ngajal, we worked with the community to undertake a psychosocial impact assessment of the visitation and use on the Aboriginal community resident at Mossman Gorge. The research was funded by the Wet Tropics Management Authority as part of a large, multi-year project examining impacts of visitation and use in the Wet Tropics World Heritage Area and I would like to acknowledge the project leaders, Dr Joan Bentrupperbaumer and Professor Joseph Reser.

This presentation is a reflection on the ethical issues raised by the psychosocial impact assessment, both the process and the findings, and is supported by my understanding of ethics gained through the Vincent Fairfax Fellowship in ethical leadership, run by the St James Ethics Centre.

What is ethical behaviour?
Hugh Mackay in a 1992 symposium said:

*The fundamental point about ethical behaviour is that it willingly takes the rights, the needs and welfare of others into account. It is not behaviour which simply responds to the pressure of law, regulation or code: it is behaviour which synthesises a number of conflicting pressures and competing claims, and never quite feels neat and tidy. Black and white judgements rarely emerge from sensitive ethical debate.*

Simon Longstaff, whilst acknowledging ethics has connections with codes, philosophical theories and morality, outlines the points below that show its broader, practical, everyday face:

- Ethics is about relationships.
It's about struggling to develop a well-informed conscience.

It's about being true to the idea of who we are and what we stand for.

It's about having the courage to explore difficult questions.

It's about accepting the cost.

It's about the asking of one simple question when faced with everyday life and the complexities of the workplace: What ought I to do?

(Simon Longstaff, Is Ethical Progress Possible? 1 December 2001.)

Context:
The Wet Tropics World Heritage Area of Queensland stretches in part from Townsville to Cooktown covering nearly 9,000 square meters. At the time of the research in 1998, there were 4.4 million visits per year to recognised Wet Tropics WHA sites, with 60% of these visits being domestic and international tourists. The remaining 40% were local residents. Mossman Gorge is the most visited site in the Wet Tropics World Heritage Area, receiving over 500,000 visits per year. To access the visitor site located 80 km north of Cairns, people drove or were bussed through the middle of the Mossman Gorge Aboriginal community. The Mossman Gorge Aboriginal community was formerly a mission and is now home to around 160 people.

An ethical approach to SIA:
Applying Simon’s points on applied ethics, I will outline the ethical process and issues identified by the psychosocial impact assessment with the Mossman Gorge Aboriginal community:

Ethics is about relationships:
- Process: Time to develop trust and relationships – 8 months of visits and conversations before the research began.
- Process: Culturally respectful – conscious of cultural principles relating to dress, language, location.

It's about struggling to develop a well-informed conscience.
- Process: Community leaders endorsed the research methodology and questions
- Issue: Inappropriate tourism, visitors driving around the community to see Aboriginal culture, experienced by the community as like ‘being in a goldfish bowl’

It's about being true to the idea of who we are and what we stand for.
- Issue: Cultural responsibility to care for visitors to site, incidents of visitor injury and death have a psychological impact on elders
- Process: Taking the time during the research to allow a reflective approach

It's about having the courage to explore difficult questions.
- Issue: Responsibility to care for country vs current management arrangement for visitor site
- Process: Community contribution in the analysis of results and report writing, including recommendations, these included a staged process for Kuku Yalanji to manage the visitor site.

It's about accepting the cost.
- Process: Documentation of the psychological and social impacts/costs being experience by the community, including the issues of safety of children
- Issue: Implications for future management of visitation

Importantly the psychosocial impact assessment was the catalyst for change at Mossman Gorge. It led the community to develop the big picture plan, Bama Bubu Nganjin Djuma Ngajal. The one simple ethical question, ‘What ought I to do?’, guided the planning project which defined actions to address the psychosocial impacts and challenges experienced by the community. Since the ‘Gateway
project’, the largest physical change with a construction budget of $16M, a visitors now gain insight into the culture and lives of the Kuku Yalanji as well as visiting the natural site.

For those of you interested in reading more on SIA and ethics, I recommend the 2013 paper by Baines, Taylor and Vanclay in the Journal of Impact Assessment and Project Appraisal. This paper considers a range of ethical issues in SIA and discusses 18 principles of ethical research as they pertain to SIA practice.

For those of you interested in reading more on applied ethics, I encourage you to visit the website of the St James Ethics Centre, an independent not-for-profit organisation that provides an open forum for the promotion and exploration of ethical questions - http://www.ethics.org.au/

The St James Ethics Centre offers a free ethical counselling service, ethi-call, to provide professional guidance on navigating the complexities of ethical issues and dilemmas.