



**ANDREW FRANKLAND**

**OBJECT**

Submission ID: 217915

Organisation:	<i>The Kindred Practice - Child, Adolescent, and Family Psychology</i>	Key issues: <i>Social impacts</i>
Location:	<i>New South Wales 2576</i>	
Attachment:	<i>N/A</i>	

Submission date: 11/25/2024 12:54:02 AM

*I write this objection from the perspective of a clinical psychologist and as a concerned member of the community. I run the largest group psychology practice in the Southern Highlands and have observed the community response to the development closely over the past four years. I have seen the community grappling with shock, disappointment, betrayal, and anger. Many of these emotions are understandable in the context of a large development proposal but have been exponentially increased due to the community engagement and SIA process. The Department's assessment clearly states that the concerns raised in the SIA can be appropriately addressed through mitigation measures and this confidence formed part of their decision to recommend the project. The Department's own SIA Guidelines emphasize the importance of meaningful engagement that is inclusive, respectful, and tailored to community needs. Despite the length and density of the various documents produced during the SIA, they fail to capture the depth of concern, stress, and distress experienced by the broader community in response to the Plasrefine proposal. I trust that the presentations at the IPC Public Hearings will have conveyed the inadequacy of the community consultation process. These community views have been deliberately misrepresented as being held by only a small fraction of the community. Yet, the objection to this proposal is so unified that there can be no possibility of the Plasrefine development having a social license to proceed.*

*There is a rich field of psychology referred to as Community Psychology which focuses on understanding and improving the relationships between individuals and their broader social, cultural, and environmental contexts. It emphasizes collective well-being, social justice, empowerment, and the systemic factors that influence people's lives. The knowledge of community psychology is relevant to large-scale developments such as Plasrefine, which is likely to create significant social and environmental disruptions that affect community dynamics, health, and quality of life. Key aspects of community psychology such as addressing systemic power imbalances, promoting community participation in decision-making, and ensuring that marginalized voices are heard are critical when assessing the impacts of large developments. Community psychology principles can and should inform processes like Social Impact Assessments by ensuring they adopt a holistic, participatory, and inclusive approach.*

*Community Psychology also offers a framework that avoids some of the risk of over-intellectualisation of human experience and turning important concepts into abstractions. Examples include the EthosUrban discussion (in the SIA) of 'topophilia' and 'place attachment' to create an emotional distance between their report and a very simple truth - the 'places' being discussed are people's homes - where they work, raise children, play, and live. The Southern Highlands community has a deep connection to its environment - not just because of its rural history but also as an alternative to living in cities or large suburbs. Families are drawn to the area to provide a lifestyle for their children that prioritises and values outdoor space and a healthy environment. In my professional role, I support many families who have relocated from Sydney for these reasons. There are enormous physical and emotional benefits to having space to play and live outside - and so many negative impacts of following the Proponent's recommendation to limit time spent outdoors to mitigate the health impacts of the Plasrefine facility.*

*Many of these principles also appear in the Department's SIA Guidelines, which explicitly state that they place people at the heart of planning. I would confidently state that the SIA for the Plasrefine development fails entirely to capture, convey or even acknowledge the profound social impact of this development and has*



*misrepresented and minimised these views throughout the process. The SIA's engagement process was adversarial and dismissive, alienating community members rather than fostering trust. Given the extensive experience of those carrying out this consultation, the abject failure to understand or reflect community views can only be seen as the successful product of a strategic and business imperative to marginalise the local community. A good Social Impact Assessment (SIA) should be a comprehensive, iterative process that identifies, predicts, evaluates, and addresses the social changes and impacts associated with a project. It should adhere to the guiding principles of inclusivity, respect, transparency, and meaningful community engagement. It should align with human rights principles, ensuring non-discrimination and fostering equity while incorporating the voices of all relevant stakeholders in a respectful, culturally appropriate manner. Additionally, it must address both direct and cumulative impacts, with the ultimate goal to minimize harm, enhance benefits, and promote sustainable, equitable outcomes that respect the dignity and well-being of impacted communities.*

*The Department of Planning indicate that they sought independent expert analysis of the SIA reports, completed by Professor Ryan. With respect to Professor Ryan's cursory review of the publicly available materials, I note several concerns relating to her analysis and her recommendations:*

- Dr Ryan demonstrates a superficial understanding of community concerns regarding the proposed development, largely based on the lack of appropriate data in the EthosUrban SIA or the community engagement summaries from GHD.*
- Dr Ryan has no training or expertise in evaluating risks relating to psychological health which limits her competence in assessing this component of the SIA (on page 3 of her report). The absence of any psychological expertise in the review process is particularly troubling, given the high levels of stress, anxiety, and distress observed in the community. The SIA guidelines call for assessments to be rigorous and proportionate, yet this omission demonstrates a lack of competence in addressing a critical component of the project's social impact. The failure to consider cumulative impacts, as explicitly required by the guidelines, further undermines the assessment's credibility.*
- Dr Ryan's letter does not appear to address cumulative impacts, which are explicitly identified in the Department's SIA guidelines as critical to a thorough assessment. This oversight is significant, as cumulative impacts often exacerbate social and environmental harms, particularly in areas with other state-significant developments or industrial activities.*
- There is no discussion of how the SIA addressed distributive equity, particularly the disproportionate impact on vulnerable groups such as families with young children, retirees, or those with pre-existing health conditions. This is a key omission, given the high potential for adverse effects on these populations.*
- Dr Ryan's letter does not balance the discussion of positive and negative impacts, nor does it substantiate the claim that social impacts are mitigable. Positive impacts should be carefully evaluated to ensure they are realistic, and negative impacts should be assessed comprehensively to reflect the community's lived experiences and fears.*
- By focusing on Conditions of Consent, Dr Ryan leaves the responsibility for monitoring and mitigating impacts to future processes without providing specific recommendations for oversight, adaptive management, or participatory monitoring plans. Conditions of Consent are often poorly enforced, and relying on them sidesteps the need for rigorous upfront analysis and proactive mitigation strategies. This reliance shifts the burden of accountability to post-approval processes, leaving the community vulnerable to unanticipated harms. This is particularly inadequate for a project of this scale, where high risks demand a precautionary and preventative approach*
- Dr Ryan fails to acknowledge that the SIA explicitly states that the risk of psychological harm and distress to the community remains high even after successful mitigations are in place.*



- There is no discussion of the SIA's failure to consider a life-cycle focus to address impacts at all stages of the project.

*Despite the superficial descriptions of ~anxiety' and ~stress' in the SIA, I can attest to the significant distress our community is experiencing. This distress will only grow if the proposal is allowed to proceed. Many community members have been living with chronically elevated stress for years as a result of this proposal, which has a significant impact on emotional health and quality of life. This development has fractured the community's sense of safety and trust and created a widespread level of distress. In its current form, the Social Impact Assessment for the Plasrefine development fails to meet the rigorous standards set by the Department's guidelines. Its shortcomings ranging from a lack of meaningful community engagement to the omission of cumulative and psychological impacts are reflective of the contempt and disregard for the community that has characterised this development process. The project risks causing significant harm to the well-being and cohesion of the Southern Highlands community. I urge the Commission to reject this proposal.*

*Dr Andrew Frankland*

*Director, The Kindred Practice*

*BPsych (Hons), M.Criminology, MClInPsch, PhD (Psychology)*

---