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HIIPDA

Smithfield Battery Energy Storage System Social Impact Assessment

ENERGY

Prepared for Iberdrola Australia

October 2023



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Quality control

This Social Impact Assessment (SIA) has been prepared to accompany the State Significant Development Application for the Project (SSD-59325460).

The SIA was completed on 31 October 2023.

It is my opinion that the SIA contains all relevant information as specified in the Social Impact Assessment Guideline for State Significant Projects.

I understand the legal and ethical obligations set out in the SIA Guideline and confirm that none of the information in the SIA is false or misleading.

I satisfy the requirements for lead authors of SIAs as set out in the SIA Guideline as follows:

- Qualifications: Bachelor of Science, Bachelor of Social Science, Master of Planning
- Experience: Five years preparing Social Impact Assessments
- Professional memberships: Member of Planning Institute of Australia

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INTRODUCTION



1.0 INTRODUCTION

Smithfield BESS Pty Ltd (Smithfield BESS), as owned by Iberdrola Australia Limited (Iberdrola) (the Proponent) is seeking development consent for the construction, operation and maintenance of a Battery Energy Storage System (BESS) (the Project) at the Smithfield Energy Facility (SEF) (Lot 33, DP850596) at 6 Herbert Place, Smithfield NSW 2164 (the Project Site). The BESS will be up to 72 Megawatt (MW) and would provide up to 260 Megawatt hours (MWh) of battery storage capacity.

HillPDA has been engaged to prepare a Social Impact Assessment (SIA) for the Project. The SIA has been developed to align with the NSW Department of Planning and Environment (DPE) *Social Impact Assessment Guideline 2023* (the *SIA Guideline*). This assessment includes an analysis of the existing social environment. It aims to identify both positive and negative social impacts associated with the Project, while also suggesting mitigation measures to maximise social benefits and minimise negative impacts to the community.

When operational, the Project will support the NSW Government's electricity strategy for a reliable, affordable and sustainable electricity future that supports a growing economy. BESS facilities, such as the Project, assist with intermittency risks associated with renewable energy generation in NSW, and are considered a key element of the transformation of the NSW energy sector.

1.1 Secretary's Environmental Assessment Requirements

This SIA has been prepared in accordance with the requirements of DPE, which are set out in the Secretary's Environmental Assessment Requirements (SEARs) (SSD 59325460) for the Project, issued on 13 July 2023. The SEARs identify matters which must be addressed in the Environmental Impact Statement (EIS).

The SEARs indicate that this SIA must provide the following information, as outlined in Table 1. This SIA has been prepared to align with the SIA Guideline to meet the SEARs for this SSDA.

Table	1:	Extract	from	the	project-specific	SEARs
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Key Issue	Issue & Assessment Requirements	How It Is Addressed	Section of This Report
Social impact	An assessment of the social impacts in accordance with Social Impact Assessment Guideline	This SIA has been prepared to align with the <i>Guideline</i> . It provides a social baseline and utilises a framework to evaluate and respond to social impacts.	Chapters 3.0, 4.0, 6.0 & 7.0

1.2 SIA Guideline

DPE published an updated *SIA Guideline* in February 2023. The Guideline provides detailed guidance on the requirements for preparing an SIA for State Significant Development Applications. This SIA has been prepared to satisfy the requirements of the Guideline as directed by the SEARs.

The methodology for this assessment, outlined in Chapter 2.0, is consistent with the requirements of the Guideline. The qualifications of the project team are available on page 4, which comply with the requirements of the Guideline.

1.3 The Project

1.3.1 Project overview

The Project would involve construction and operation of the following:

A BESS including battery enclosures, inverters, transformers, switch room and control room



- Medium voltage cables between transformers and the existing switchgear building in the northeast corner of the SEF
- Switchgear building upgrades to facilitate connection of the BESS
- Site access to the BESS from Herbert Place
- Utilities to support operation of the BESS
- Stormwater management infrastructure, lighting, fencing and security.

The BESS would operate 24 hours a day, seven days a week.

A site plan of the Project is shown below in Figure 1.

Figure 1: Site plan



Source: Arcadis (2023)

1.3.2 Site context

The Project Site is located at the SEF at 6 Herbert Place, Smithfield NSW 2164. The Project Site is within the Cumberland local government area (LGA) in Western Sydney, around 30 kilometres west of the Sydney Central Business District (CBD). Figure 2 displays the Project Site and its surrounds.





Figure 2: Aerial image of the Project Site and immediate surrounds, 6 Herbert Street, Smithfield

Source: HillPDA, Google (2023)

The Project Site is located within an existing industrial area, part of the Smithfield Recycling and Manufacturing Precinct (SRMP). The Project Site is bounded to the south, west and east by the Visy Smithfield Recycling Facility (Visy site), and to the north by Kingspan. The Visy site operates a paper and plastics sorting and recycling facility. The Kingspan site includes a large carparking area and a warehouse used for assembly, service, and storage of retail and commercial water tanks. The nearest residential receiver is located approximately 400 metres south of the Project Site.

The SEF is owned and operated by Smithfield Power Generation Pty Ltd on land leased from Visy. The SEF has been in operation since 1996, originally designed and operated as a gas Combined Cycle Gas Turbine (CCGT or cogeneration) power plant, supplying both electricity to the NSW electricity grid and heat in the form of steam to the adjacent Visy Smithfield Recycling Facility. Since 2017, the SEF has operated as a gas peaking power plant supplying electricity to the NSW electricity grid during periods of peak demand and no longer supplies steam to the adjacent Visy Smithfield Recycling Facility.

METHODOLOGY



2.0 METHODOLOGY

The approach to conducting this SIA reflects current industry best practice including DPE *SIA Guideline*.

The SIA aims to scope, assess, and enhance or mitigate potential positive and negative impacts that may arise from the Project. The method for this SIA is divided into three phases as shown in Figure 3 below.

Figure 3: SIA process



Source: HillPDA, DPE (2023), Social Impact Assessment Guideline.

2.1 Defining social impacts

A social impact can be defined as the net effect of an activity on a community and the wellbeing of individuals and families. Social impacts may occur across a range of aspects of an individual's and a community's life, as shown in Figure 4.

way of life	how people live, how they get around, how they work, how they play, and how they interact on a daily basis
community	composition, character, cohesion, function, and sense of place
access	how people access and use infrastructure, services and facilities, whether provided by local, state, or federal governments, or by for-profit or not-for-profit organisations or groups
culture	both Aboriginal and non-Aboriginal culture, including shared beliefs, customs, values, and stories, and connections to country, land, waterways, places, and buildings
health and wellbeing	physical and mental health, especially for those who are highly vulnerable to social exclusion or substantial change, plus wellbeing of individuals and communities
surroundings	access to, and use of, services that ecosystems provide, public safety and security, access to and use of the natural and built environment, and its aesthetic value and amenity
livelihoods	people's capacity to sustain themselves, whether they experience personal breach or disadvantage, and the distributive equity of impacts and benefits
decision-making systems	whether people experience procedural fairness; can make informed decisions; have power to influence decisions; and can access complaint, remedy and grievance mechanisms

Figure 4: Types of social impact

Source: Adapted from DPE (2023), Social Impact Assessment Guideline.



2.2 Scoping

Social impacts arising from a development may be positive, negative and cumulative. Table 2 presents the outcomes of impact scoping undertaken for the project. The table identifies high level key impact areas for detailed investigation, that may be affected by the Project.

Table	2:	Types	of	social	impacts
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Type of impact	High level scoping of issues			
Negative social impacts	 Negative social impacts result from changes to the physical or social fabric that make it worse (in any of the impact categories) than before the project took place. These may include: Increased dust or noise levels affecting health Decreased amenity during construction Alterations to community character through land use changes. 			
Positive social impacts	 Positive social impacts result from changes to the physical or social fabric that make it better any of the impact categories) than before the project took place. These may include: Increased access to jobs in the local area Improved amenity through provision of open space Stronger sense of community through provision of community space. 			
Cumulative social impacts	 Cumulative social impacts result from changes to the physical or social fabric that occur from multiple projects or activities that need similar resources or affect similar impact categories. These may include: Increased traffic level from construction vehicles for multiple projects in one area A shortage of workers in an area due to multiple similar projects Health impacts from persistent noise or dust levels due to ongoing projects. 			

Source: HillPDA, DPE (2023), Social Impact Assessment Guideline.

2.3 Evidence base

To assess the social impacts accurately, an SIA must also provide an accurate assessment of the social baseline of the project surrounds. This means that the existing surrounds of the Project must be considered through the collection of data to establish benchmarks against which the impacts of the Project can be assessed.

To establish this social baseline, HillPDA has conducted a desktop review of the available information provided by the proponent, as well as research conducted with a high degree of impartiality using trusted, industry-standard sources to inform our understanding of relevant demographic and social trends.

The evidence base for this SIA includes data from sources such as:

- Australian Bureau of Statistics
- NSW Bureau of Crime Statistics and Research
- NSW Department of Planning and Environment
- Relevant information provided by Council and/or the proponent
- Profile .id.

The findings of this work are outlined in Chapter 3.0.

2.4 Predicting, analysing and evaluating impacts

The impact assessment framework presented in this report identifies and evaluates changes to the social baseline due to the Project. This includes the assessment of positive, negative, and cumulative impacts as outlined in section 2.1. Changes can be tangible or intangible; qualitative or quantitative; direct or indirect; and subjectively experienced.

The likelihood of social impacts arising from each matter is assessed as part of the scoping process. Matters which are identified as having potential social impacts are then assessed. Professional judgement and experience is applied on a case-by-case basis to identify the significance of impact on the social environment.



The likelihood of a potential impact is a primary element of considering each social impact and its risk rating. The criteria used to determine the likelihood of any potential impact are described in Table 3.

Likelihood	Description	Indicative Probability
Almost certain	Definite or almost definitely expected	Greater than 90 per cent
Likely	High probability	70 per cent
Possible	Medium probability	50 per cent
Unlikely	Low probability	30 per cent
Very unlikely	Improbable or remote possibility	Less than 10 per cent

Source: DPE (2023), Social Impact Assessment Guideline. Adapted from Esteves A.M.et. al. (2017)

The magnitude of a potential impact is a key consideration to determine a risk rating. In determining the magnitude of a potential impact there are five key characteristics that must be considered, these are shown below in Table 4.

Table 4: Dimensions of social impacts

Characteristic	Details needed to enable assessment
Extent	Who is expected to be affected? Will any vulnerable groups be impacted? Which locations and people are affected?
Duration	When is the impact expected to occur? Will it be temporary or permanent?
Intensity or scale	What is the likely scale or degree of change?
Sensitivity or importance	How sensitive/vulnerable or adaptable/resilient are affected people to the impact, or (for positive impacts) how important is it to them?
Level of concern/interest	How concerned or interested are people?
Source: DPE (2023). Social Impac	t Assessment Guideline, Adapted from Esteves A.M.et. al. (2017)

Table 5 below identifies the overall magnitude level of impact rating.

Table 5: Magnitude of impact

Magnitude	Description
Minimal	No noticeable change experienced by people in locality.
Minor	Mild deterioration/improvement, for a reasonably short time, for a small number of people who are generally adaptable and not vulnerable.
Moderate	Noticeable deterioration/improvement to something that people value highly, either lasting for an extensive time, or affecting a group of people.
Major	Substantial deterioration/improvement to something that people value highly, either lasting for an indefinite time or affecting many people in a widespread area.
Transformational	Substantial change experienced in community wellbeing, livelihood, amenity, infrastructure, services, health and/or heritage values; permanent displacement or addition of at least 20% to a community.

Source: DPE (2023), Social Impact Assessment Guideline. Adapted from Esteves A.M.et. al. (2017)

Potential impacts identified in the scoping process are analysed based on the nature of the impact and its predicted severity, and based on this, are assigned a level of significance in line with Table 6.

Table 6: Social impact significance matrix

		Magnitude					
_		Minimal	Minor	Moderate	Major	Transformational	
	Almost certain	Low	Medium	High	Very high	Very high	
poc	Likely	Low	Medium	High	High	Very high	
liho	Possible	Low	Medium	Medium	High	High	
Like	Unlikely	Low	Low	Medium	Medium	High	
	Very unlikely	Low	Low	Low	Medium	Medium	

Source: Adapted from DPE (2023), Social Impact Assessment Guideline.



2.5 Social impact management

Where impacts are identified, the SIA provides mitigation and/or enhancement measures. For potential negative impacts, measures are identified to avoid or minimise impacts by amending the project or its delivery. For potential positive social impacts, the SIA identifies measures to enhance the benefit of that impact. Social impact management is an ongoing process.

SOCIAL BASELINE



3.0 SOCIAL BASELINE

This chapter describes the socio-economic characteristics of the study area to enable the potential impacts of the Project to be considered within the local context.

3.1 Study Area

For the purposes of this SIA, the study area has been defined as Smithfield Suburbs and Localities (SAL), which is a suburb within the Cumberland City LGA (north) and Fairfield LGA (south). Where possible, socio-economic indicators have been benchmarked against Greater Sydney Region. The study area is displayed in Figure 5 below.



Figure 5: Demographic study area

Source: HillPDA, ABS (2023)

The Project Site is located within the Smithfield Industrial Estate, which comprises the northern portion of the study area within the Cumberland LGA. This area is comprised almost entirely of industrial land uses. The location of the Project Site within the Smithfield Industrial Estate is displayed in Figure 7.

The Smithfield Industrial Estate, together with the industrial areas in Wetherill Park to the west, forms the broader Smithfield-Wetherill Park Industrial Estate. According to Fairfield City Council, the Smithfield-Wetherill Park Industrial Estate is one of the largest in the Southern Hemisphere and is home to nearly 3,000 businesses and 20,000 jobs.¹ It is strategically connected to national and international transport networks, including the M4 and M7 motorways, the new Western Sydney Airport and nearby intermodal terminal.

¹ Fairfield City Council (2023), Smithfield Wetherill Park Industrial Estate





Figure 6: Location of the Project Site within Smithfield Industrial Estate

Source: HillPDA, Google (2023)

The southern portion of the study area comprises the remaining portions of Smithfield (SAL) to the south of Prospect Creek. This area of Smithfield (SAL) is situated within the Fairfield LGA and consists of predominantly residential land uses, apart from some industrial land uses to the west of the Cumberland Highway. However for the purposes of this SIA, the study area is defined as the entirety of Smithfield (SAL).

3.2 Access

Access to the Project Site is via Herbert Place, a 40 kilometre per hour dual lane local road. Herbert Place is accessed by Cumberland Highway (a state road) from the north and south, and Long Street (a local road) from the west. The nearest railway station is Yennora railway station, approximately 2.5 kilometres to the southwest of the Project Site.

Access to public transport is provided by bus stops located to the north and south of the Project Site. Frequent services only operate on the T80 bus route, which has a bus stop at the intersection of Percival Road and the Liverpool-Parramatta T-way, located approximately 700 metres to the north of the Project Site. Local bus routes are detailed in Table 7 and illustrated in Figure 7.

Route number	Route	Frequency
812	Blacktown to Fairfield via Prospect Hwy	30 minutes
813	Bonnyrigg and Western Sydney Parklands to Fairfield	30 minutes
814	Fairfield to Smithfield and Wetherill Park Industrial Area (Loop Service)	30 minutes (peak times)
821	Smithfield Industrial Area or Woodpark to Guildford	30 minutes (peak times)
Т80	Liverpool to Parramatta via T-way	5 minutes (peak times)

Table 3	7: Bus	routes	accessible	from	the	Project	Site
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Source: HillPDA; Imagery: Google



3.3 Demographic snapshot



The Census usual resident population of the Study Area in 2021 was **13,160 people**, living in **4,515 dwellings** with an **average household size of approximately 3.1.** The usual resident population of the study area increased by 1,188 people between 2016 and 2021, representing an **increase of approximately 10 per cent** over this period.

In 2021, the **median age** of Smithfield (SAL) was 38, compared to 37 for Greater Sydney. In terms of **age distribution**, 19.8 per cent of the study area was aged 0-14, 63.6 per cent was aged 15-64, and 16.6 per cent was aged 65 years and over. This compares to 18.4 per cent, 70.9 per cent, and 10.7 per cent for Greater Sydney.



In 2021, 68.2 per cent of people spoke a **language other than English** at home, significantly higher than the 42.0 per cent of Greater Sydney's households. In 2021, 42.4 per cent of the study area population was born in Australia, compared with 56.8 per cent in Greater Sydney.



At the 2021 Census, the top response for **religious affiliation** was Catholic (38.4 per cent), followed by No Religion (10.6 per cent) and Islam (9.4 per cent). This compares to No religion (30.5 per cent), Catholic (22.1 per cent), and Anglican (9.2 per cent) across Greater Sydney.

In 2021, **separate houses** comprised 77.3 per cent of all occupied dwellings in the study area, whilst 10.7 per cent were **semi-detached** dwellings and 10.2 per cent were **flats or apartments**. This compares to 55.8 per cent, 12.8 per cent and 30.7 per cent respectively for Greater Sydney.



There were 51 per cent of households in the study area that had **two or more motor vehicles** registered, compared to 46 per cent in Greater Sydney. The proportion of households in the study area with **no motor vehicles registered** (11.6 per cent) was slightly higher than the proportion for Greater Sydney (11.1 per cent).

In 2021, the **median weekly household income** in the study area was \$1,300 per week, which was significantly lower than Greater Sydney's **median weekly household income** at \$2,077 per week.

At the 2021 Census, the proportion of **family households** was slightly higher in the study area (75 per cent) than in Greater Sydney (73 per cent). Concurrently, the proportion of **lone person households** (23 per cent) and **group households** (2 per cent) was slightly smaller in the study area when compared to Greater Sydney, at 24 per cent and 4 per cent respectively.

Of residents aged 15 years and over in the study area, there were 4,040 people who reported being **in the labour force** in 2021, of which 1,821 (44.9 per cent) worked full time, 1,078 (26.6 per cent) worked part-time, and 780 (19.2 per cent) were away from work. There were also 361 persons (8.9 per cent) who were **unemployed**, higher than the Greater Sydney average of 5.1 per cent.



The most common **industries of employment** were Supermarket and Grocery Stores (3.3 per cent), Road Freight Transport (2.7 per cent) and Hospitals (except Psychiatric Hospitals) (2.7 per cent). The most common **occupations** were Professionals (15.4 per cent), Clerical and Administrative Workers (14.5 per cent) and Technicians and Trades Workers (14.3 per cent).

Source: ABS (2021), Quickstats



3.4 Social advantage and disadvantage

The Socio-Economic Indexes for Areas (SEIFA) are rankings of relative socio-economic status (advantage and disadvantage) for different geographic areas, within each state and nationally. The indexes rank areas against others of the same geographic type (e.g. Local Government Area or Statistical Area Level 1) based on specific socio-economic metrics, selected based on the particular SEIFA index.

3.4.1 Relative socio-economic disadvantage

Index of Relative Socio-economic Disadvantage (IRSD) examines factors like unemployment, proportion of lower income households, lower education levels or lack of internet access to compare overall levels of disadvantage in areas. Figure 8 displays the distribution of IRSD rankings for SA1s within the study area which show higher levels of disadvantage. This shows that all SA1s in the study area are concentrated within the two most disadvantaged declines, with 19 SA1s (76 per cent) being within the most disadvantaged decile. This indicates that there is high socio-economic disadvantage throughout the study area.



Figure 8: Distribution of SA1s within the study area on the IRSD (national)

Source: ABS (2021). SA1s for which no score is recorded (low population) have been excluded.

This data has been mapped spatially in Figure 9. The SA1s immediately surrounding the subject site have higher levels of disadvantage, potentially indicating:

- Fewer households with higher incomes
- Fewer residents with qualifications
- Fewer residents in high skilled occupations.

The significant amount of predominantly industrial land around the site can be seen in the absence of scores for some SA1s, where the population is too low to calculate a SEIFA score (hence they appear blank).





Figure 9: SA1s near to the subject site ranked against others on the IRSD using deciles

Source: ABS (2021). SA1s for which no score is recorded (low population) have been excluded.

3.4.2 Relative socio-economic advantage and disadvantage

Index of Relative Socio-economic Advantage and Disadvantage (IRSAD), in addition to the indicators of disadvantage above, examines factors like professional occupations, high income, higher education levels, larger houses to compare overall levels of advantage and disadvantage in areas.

Figure 10 shows the distribution of IRSAD rankings for SA1s within the study area. All SA1s are within the three most disadvantaged deciles, including 8 SA1s (32 per cent) within the most disadvantaged decile. Additionally, there are no advantaged SA1s throughout the study area. This indicates the study area has a high concentration of socio-economic disadvantage.



Figure 10: Distribution of SA1s within the study area on the IRSAD (national)

Source: ABS (2021). SA1s for which no score is recorded (low population) have been excluded.

This data has been mapped spatially in Figure 11. The SA1s immediately surrounding the Project Site have moderate to high levels of disadvantage, potentially indicating:



- Fewer households with high incomes, or less people in skilled occupations
- More households with low incomes, or more people in unskilled occupations.

Again, the significant amount of predominantly industrial land around the site can be seen in the absence of scores for some SA1s, where the population is too low to calculate a SEIFA score (hence they appear blank).

Figure 11: SA1s near to the subject site ranked on the IRSAD using deciles



Source: ABS (2021). SA1s for which no score is recorded (low population) have been excluded.

3.5 Crime

Data from the NSW Bureau of Crime Statistics and Research (BOCSAR) was reviewed to determine the presence of crime hotspots near the Project Site in the year to March 2023. A review of this BOCSAR data hotspots for all reviewed crimes within 400 metres and 800 metres of the Project Site. The strongest hotspots in the immediate vicinity of the Project Site were for theft (motor vehicle), theft (break and enter non-dwelling) and domestic assault. Data from BOCSAR has been mapped below in Figure 12 to illustrate these crime hotspots nearby to the Project Site.





Figure 12: BOCSAR crime hotspot maps for incidents between April 2022 and March 2023

Theft (break and enter dwelling)















Domestic assault



Detailed data obtained from BOCSAR is shown in the tables below for the crimes mapped above. These tables compare rates in Smithfield (SAL) with the rates in Cumberland (LGA) and NSW.

Table 8 shows that rates of theft (break and enter dwelling) have increased in the Cumberland LGA and NSW over the last two years, whilst the count of crimes in Smithfield (SAL) was too low to produce a statistically significant trend. Rates of this crime in the LGA and NSW were approximately three times greater than the rates in Smithfield (SAL).

Year to	March 2023	March 2022	March 2022		
Area	Trend (2 year)	Count	Rate	Count	Rate
Smithfield (SAL)	n.c.	16	121.3	11	83.4
Cumberland (LGA)	Up 20.2% per year	480	202.5	577	243.5
New South Wales	Up 8.6% per year	17,446	215.5	18,938	234.0

Table 8: Incidents of theft (break and enter dwelling) from April 2021 to March 2023 (rate per 100,000 population)

Source: NSW BOCSAR (2023)²

Table 9 shows that rates of theft (break and enter non-dwelling) were stable in NSW over the past two years, whilst the count of crimes in Smithfield (SAL) was too low to produce a statistically significant trend. Meanwhile, rates of this crime increased significantly by 104.3 per cent per year in the Cumberland LGA. In the year to March 2023, rates of theft (break and enter non-dwelling) were much higher in Smithfield (SAL) than across the LGA or NSW.

Table 9: Incidents of theft (break and enter non-dwelling) fro	m April 2021 to March 2023 (rate per 100,000 population)
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Year to	March 2023	March 2022	2	March 2023	;
Area	Trend (2 year)	Count	Rate	Count	Rate
Smithfield (SAL)	n.c.	11	83.4	20	151.7
Cumberland (LGA)	Up 104.3% per year	94	39.7	192	81.0
New South Wales	Stable	7,252	89.6	7,534	93.1

Source: NSW BOCSAR (2023)³

Table 10 shows that rates of malicious damage to property were stable across all areas in the two years to March 2023. Out of the three comparison areas, the data shows that crime rates for malicious damage to property were highest in NSW and lowest in Smithfield (SAL), with rates in the Cumberland LGA were at approximately at halfway in between.

Table 10: Incidents of malicious damage to property from April 2021 to March 2023 (rate per 100,000 population)

Year to	March 2023	March 2022	March 2022		
Area	Trend (2 year)	Count	Rate	Count	Rate
Smithfield (SAL)	Stable	39	295.7	38	288.1
Cumberland (LGA)	Stable	919	387.8	998	421.1
New South Wales	Stable	48,395	597.9	48,889	604.0

Source: NSW BOCSAR (2023)⁴

Table 11 shows that rates of theft (motor vehicle) were stable for Smithfield (SAL) and the LGA over the two years to March 2023, whilst rates across NSW increased by 21.3 per cent per year. Several hot spots for this crime have been identified in proximity to the Project Site, as displayed in Figure 12. This is reflected in the higher rates of theft (motor vehicle) in Smithfield (SAL) than in the LGA and NSW across both 12-month periods to March 2023.

² (NSW Bureau of Crime Statistics and Research, 2023)

³ (NSW Bureau of Crime Statistics and Research, 2023)

⁴ (NSW Bureau of Crime Statistics and Research, 2023)



Year to	March 2023	March 2022		March 2023	
Area	Trend (2 year)	Count	Rate	Count	Rate
Smithfield (SAL)	Stable	35	265.4	39	295.7
Cumberland (LGA)	Stable	354	149.4	380	160.3
New South Wales	Up 21.3% per year	10,586	130.8	12,836	158.6

Table 11: Incidents of theft (motor vehicle) from April 2021 to March 2023 (rate per 100,000 population)

Source: NSW BOCSAR (2023)²

Table 12 shows that rates of reported domestic assault remained stable across all areas over the two years to March 2023, apart from NSW where they increased by 5.2 per cent per year. Rates of this crime were highest in Smithfield (SAL) out of the three comparison areas across both 12-month periods.

Table 12: Incidents of domestic assault from April 2021 to March 2023 (rate per 100,000 population)

Year to	March 2023	March 2022	March 2022		
Area	Trend (2 year)	Count	Rate	Count	Rate
Smithfield (SAL)	Stable	68	515.6	65	492.9
Cumberland (LGA)	Stable	882	372.2	923	389.5
New South Wales	Up 5.2% per year	32,329	399.4	34,017	420.3

Source: NSW BOCSAR (2023)²

Table 13 shows that rates of non-domestic assault were stable in Smithfield (SAL) and the LGA over the two years to March 2023, and increased by 13 per cent per year across NSW. Rates of this crime were consistently highest across NSW out of the three comparison areas.

Table 13: Incidents of non-domestic assault from April 2021 to Marc	ch 2023 (rate per 100,000 population)
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Year to	March 2023	March 2022	March 2022		March 2023	
Area	Trend (2 year)	Count	Rate	Count	Rate	
Smithfield (SAL)	Stable	40	303.3	28	212.3	
Cumberland (LGA)	Stable	668	281.9	757	319.4	
New South Wales	Up 13.0% per year	28,060	346.7	31,707	391.7	

Source: NSW BOCSAR (2023)²

Figure 12 identified some hotspot areas for theft (break and enter non-dwelling), theft (motor vehicle) and domestic assault within 800 metres of the Project Site. Analysis of the data in the tables above has revealed that rates for these crimes in Smithfield (SAL) were generally higher than across the two comparison areas of Cumberland (LGA) and NSW. However, it is considered unlikely that the Project would have an impact on crime rates within the locality, particularly given its location within a site of existing development. It is also possible that the intensification of development on the Project Site, including through site improvements, may assist in providing passive surveillance in the area associated with worker movements.

3.6 Social infrastructure

Social infrastructure is comprised of the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities.⁵ Social infrastructure is important to a community as it provides the tangible infrastructure to support the safety, health and wellbeing of that community which allows individuals to be happy, safe and healthy, to learn, and to enjoy life. Access to high-quality, affordable social services has a direct impact on the social and economic wellbeing of all community members. The Project Site is located within the Smithfield Industrial Estate and is predominantly surrounded by industrial developments. The industrial nature of the area surrounding the Project Site means there is limited social infrastructure in the immediate vicinity of

⁵ Infrastructure Australia (2019). *The Australian Infrastructure Audit 2019*.



the Project Site. However, there are open space, recreational, and community facilities located in proximity to the Project Site. These are displayed in Figure 13 and listed in Table 14.



Figure 13: Social infrastructure in proximity to the Project Site

Source: HillPDA, NSW Department of Planning and Environment (2023)

Table 14: Social infrastructure near the Project Site

ID	Name	Address	Туре	Within distance from site
1	Tait Street Park	3 Tait St, Smithfield	Sports Field	800 metres
2	Smithfield Park	617A The Horsley Dr, Smithfield	Sports Field	800 metres
3	Guildford West Tennis Courts	1 Foray St, Guildford West	Sports Court	800 metres
4	Guildford West Sportsground – Sports Field 1	Foray St, Guildford West	Sports Field	800 metres
5	Guildford West Sportsground – Sports Field 2	Foray St, Guildford West	Sports Field	800 metres
6	Kaluna Reserve	162 Warren Rd, Smithfield	Park	800 metres
7	Solo Reserve	127 Granville St, Smithfield	Park	400 metres
8	Tarrawarra Reserve	9 Cooper Cres, Smithfield	Park	400 metres
9	Hemingway Reserve	131 Granville St, Fairfield	Park	800 metres
10	Fairfield City Museum and Gallery	634 The Horsley Dr, Smithfield	Museum	800 metres
11	Smithfield Park Cricket Nets	617A The Horsley Dr, Smithfield	Sports Court	800 metres
12	Kiola Street Reserve	17 Kiola St, Smithfield	Park	400 metres
13	Vineyard Reserve	11A Kaluna Ave, Smithfield	Park	400 metres
14	Guildford West Sportsground – Baseball Field	1 Foray St, Guildford West	Sports Field	800 metres
15	Guildford West Sportsground – Netball Courts	116 McCredie Rd, Guildford West	Sports Court	800 metres
16	Bernadette Park	16 Bernadette Pl, Fairfield	Park	800 metres



ID	Name	Address	Туре	Within distance from site
17	Assembly Church	554 The Horsley Dr, Smithfield	Place of Worship	800 metres
18	Slavic Community Church	562 The Horsley Dr, Smithfield	Place of Worship	800 metres
19	Minh Giac Temple	20/191B McCredie Rd, Smithfield	Place of Worship	800 metres
20	Calvary Church	20/191B McCredie Rd, Smithfield	Place of Worship	400 metres
21	Core Truck Driving School	14 Tait St, Smithfield	VET Registered Training Organisation	800 metres

Social infrastructure within a 400 metre radius from the Project Site is more likely to be affected by any impacts from the development. Within 400 metres of the Project Site, existing social infrastructure is restricted to one place of worship (Calvary Church approximately 230 metres northeast of the Project Site) and four parks/reserves (Solo Reserve, Tarrawarra Reserve, Kiola Street Reserve, and Vineyard Reserve, all located approximately 400 metres south of the Project Site and making up the broader recreation area along Prospect Creek). It is unlikely that the Project would have any significant impacts on these facilities, along with the other social infrastructure facilities located within 800 metres of the Project Site.

3.7 Neighbouring developments

HillPDA investigated both recently submitted and recently determined Development Applications (DAs) in the vicinity of the Project Site. A search of Cumberland City Council's DA tracker and the major projects website revealed two noteworthy projects within an approximate 1 kilometre radius of the Project Site, including one DA and one SSDA. These are identified in Table 15 below.

Name & SSD Number	Address	Description	Estimated cost of work	Distance to site (approx.)	Status
DA2023/0182	3 Herbert Place, Smithfield	Industrial - change of use of existing industrial unit for pool chemical storage and warehousing	\$0.1 million	Adjacent	Lodged on 3 April 2023. Further information has been requested by Council.
Smithfield Recycling Centre SSD-19425495	132-144 Warren Road, Smithfield	Use of an existing warehouse (operating 24 hours 7 days a week) to receive up to 150,000 tonnes per annum of domestic and commercial recyclable materials and sort these materials into categories for transportation to dedicated reprocessing facilities.	\$19 million	0.3 km	Response to Submissions

Table 15: Surrounding developments

The adjacent proposal (DA2023/0182) was lodged on 3 April 2023, with further information having been requested by Council. This is a relatively minor proposal, which involves the change of use of the existing industrial unit for the purposes of pool chemical storage and warehousing.

The other proposal identified is the Smithfield Recycling Centre (SSD-19425495), which is proposed at 132-144 Warren Road, Smithfield, approximately 0.3 kilometres to the northeast of the Project Site. This proposal is currently at the response to submissions stage, and involves the proposed use of an existing warehouse to receive up to 150,000 tonnes per annum of recyclable materials, to be sorted and transported to dedicated reprocessing facilities. A review of the cumulative impacts of these proposals was undertaken as part of the EIS. Given the nature of the environmental impacts outlined in this EIS and Smithfield Recycling Centre EIS, potential cumulative impacts associated with most environmental aspects are considered to be minimal or negligible. However, the review identified traffic as having the greatest potential to result in cumulative impacts.



The Traffic Impact Assessment prepared for the Smithfield Recycling Centre (SSD-19425495) (MRA Consulting Group, 2022) identifies that construction is anticipated to take around 4 months, with approximately 30 light vehicles and 2 trucks expected to access the site daily for construction and installation works. Once operational, the total number of vehicular movements expected is 190 truck movement per day, 72 passenger vehicle movement per day and 4 visitor vehicle movement per day. The maximum number of truck movements would occur in the late morning, between 11 am and 12 am. Cumulative traffic modelling has been undertaken in the Traffic Impact Assessment (TIA) prepared by Arcadis for the Project with regard to background traffic growth rates and the Smithfield Recycling Centre traffic numbers above. The findings of the TIA and potential social impacts relation to traffic and access are further discussed within Chapter 5.0 of this report.

3.8 Key insights

The Project Site is located in an industrial precinct and is predominantly surrounded by other industrial developments. The study area is notable for:

- A greater proportion of households speaking a language other than English at home in the study area (68.2 per cent) than in Greater Sydney (42.0 per cent)
- A smaller proportion of residents born in Australia in the study area (42.4 per cent) than in Greater Sydney (56.8 per cent)
- A larger proportion of dwellings in the study area are separate houses (77.3 per cent) when compared to Greater Sydney (55.8 per cent). Meanwhile, the proportion of dwellings that are flats or apartments was significantly lower in the study area (10.2 per cent) than in Greater Sydney (30.7 per cent).
- There are **higher levels of socio-economic disadvantage** near the Project Site, with no highly advantaged areas within the study area.
- The existence of some crime hotspots in the immediate vicinity of the Project Site. Analysis of the data in the tables above has revealed that rates for these crimes in Smithfield (SAL) were generally higher than across the two comparison areas of Cumberland (LGA) and NSW. However, it is considered unlikely that the Project would have an impact on crime rates within the locality, particularly given its location within a site of an existing development.
- Two noteworthy DAs have been identified within an approximate 500 metre radius of the Project Site, involving a minor change of use (DA2023/0182) and the construction of a recycling centre (SSD-19425495). The latter proposal could contribute to cumulative social impacts by temporarily increasing the nearby worker population and increasing vehicle movements during construction, though this is considered to be unlikely.
- Due to its location within a broader industrial area, there is limited social infrastructure in proximity to the Project Site. The nearest social infrastructure facilities is Calvary Church, a place of worship approximately 230 metres northeast of the Project Site, and several reserves located along Prospect Creek, approximately 400 metres to the south of the Project Site.
- The Project Site is located within the Smithfield Industrial Estate and is predominantly surrounded by other industrial developments. The nearest residential land uses are located approximately 370 metres to the south of the site.

STAKEHOLDER ENGAGEMENT



4.0 STAKEHOLDER ENGAGEMENT

This chapter provides a summary of consultation activities undertaken for the Project including details of how issues raised during consultation have been addressed.

Community and stakeholder engagement for the Project has been undertaken in accordance with *Undertaking Engagement Guidelines for State Significant Projects* (DPE, 2022) and Iberdrola's Community Engagement Policy.

Community and stakeholder engagement activities regarding the Project commenced in early 2023. The targeted engagement focused primarily on notifying neighbouring business owners and government agencies of Iberdrola's intention to lodge the Scoping Report and EIS for the Project and enable stakeholders to:

- Take up any early engagement opportunities to understand the Project
- Provide feedback about aspects of the Project which they support, do not support, or wish to be adjusted
- Provide clear reasons for any concerns and possible alternative approaches
- Identify any matters they feel have not been considered.

4.1 Method

Stakeholders were identified as those that may be interested in, or who may be affected by, the Smithfield BESS. Stakeholders are listed in Table 16 and categorised into three main groups. These were:

- Government and technical stakeholders
- Landowners
- The wider community.

Stakeholders will continue to be identified and consulted during all project phases, including if approved, the construction, operation, and decommissioning and rehabilitation phases of the Smithfield BESS.

Stakeholder group	Stakeholders
Government and te	chnical stakeholders
	• DPE
State government	Fire and Rescue
State government	NSW Environment Protection Authority (EPA)
	Transport for NSW
Local government	Cumberland City Council
Utility providers	• Jemena
Impacted landowne	ers
	• Visy Recycling (Land owner 6 Herbert Place, Smithfield)
Landownor	Kingspan (Land occupier 3 Herbert Place, Smithfield)
Landowner	Goodman (Land owner 3 Herbert Plance, Smithfield)
	Fluidra (Land owner 1 Herbert Place)
Wider community	
Neighbours	All residential properties within 750 metres of the Project Site

Table 16: Identified stakeholders

The consultation mediums adopted differed depending on the agency engaged with and the nature and level of their interest in the Project. Consultation mediums included:

- Face to face meetings
- Virtual meetings
- Telephone conversations



- Email correspondence
- Letter correspondence.

A summary of the community engagement methods undertaken is provided in Table 17.

Table 17: Engagen	Table 17: Engagement methods				
Engagement method	Targeted community stakeholder group	Purpose			
Project website	All interested parties	To provide an overview of the Project, an overview of the environmental impact assessment process and key findings, answers to frequently asked questions and access to key documents.			
Newsletter	All interested parties	To provide an overview of the Project, an overview of the environmental impact assessment process and key findings, answers to frequently asked questions, access to key documents and to invite comments.			
Face to face	Neighbouring landowners	To provide an overview of the Project, an overview of the environmental impact assessment process and key findings, answers to frequently asked questions, access to key documents and to provide feedback channels.			
Enquiry lines (phone and email)	All interested parties	To provide community stakeholders with lines of enquiry to the Project team.			

4.2 Outcomes

A summary of the consultation activities carried out, the key aspects discussed, and how they been considered within the EIS and the development of the Project is provided in Table 18.



Table 18: Consultation outcomes

Stakeholder	Consultation activities	Consultation outcomes	Action taken
Department of Planning and Environment	 A Scoping Meeting was held (via teleconference) to provide an overview of the Project on 18 November 2022. A Scoping Meeting was held (via teleconference) to confirm planning pathway provide an update of the Project on 28 April 2023. Email correspondence has occurred throughout the development of the EIS. Consultation with other departments within DPE (namely the Hazards department and Biodiversity and Conservation Division) was carried early in the Project via teleconference and the BDAR wavier application process. 	 No additional specific feedback has been provided beyond the SEARs and Pre-SEARs advice letters. BDAR Waiver application granted. 	• The SEARs and how these have been addressed are identified in the EIS.
Fire and Rescue	 Briefing letter to provide an overview of the Project, invite feedback and opportunity to meet during Scoping Report and the EIS on 8 February 2023 and 4 September 2023. 	 FRNSW declined the opportunity to meet, noting that FRNSW would review and provide specific comment and recommendations on the finalised proposal via the Department of Planning Major Projects Portal. FRNSW provided links to the following documents for consideration in project planning: Access for fire brigade vehicles and firefighters (FRNSW, 2020) HIPAP No. 1 - Industry Emergency Planning Guidelines Emergency services information package and tactical fire plan. FRNSW noted that a Fire Safety Study (FSS) is generally recommended for BESS facilities such as this Project. 	 A PHA has been developed to specifically address potential hazard and risks associated with the Project. The Fire Strategy Study is an identified mitigation measure for the Project.
NSW EPA	 Briefing letter to provide an overview of the Project, invite feedback and opportunity to meet during Scoping Report and the EIS on 9 February 2023 and 21 August 2023. A meeting was held (via teleconference) on 30 August to discuss the Project. 	 EPA's key information requirements for the Project were an adequate assessment of air quality, water quality and noise. During the meeting, EPA sought clarification about how the batteries would be disposed at the end of the Project, noting that lithium is a hazardous waste. Discussed implication of the Project on EPL 5701. 	 As assessment of air quality is provided in the EIS. As assessment of water quality is provided in the EIS. As assessment of noise is provided in the EIS. As assessment of waste including decommissioning is provided in the EIS. EPA would continue to be consulted regarding the timing and need to vary EPL 5701.



Stakeholder	Consultation activities	Consultation outcomes	Action taken
Transport for NSW	 Briefing letter to provide an overview of the Project, invite feedback and opportunity to meet during Scoping Report on 2 February 2023. 	 Feedback identified several aspects to be addressed within the TIA as part of the EIS application, particularly in relation to oversize and/or over mass vehicles. 	• Table 1-2 of the TIA identifies how each TfNSW comment has been addressed.
Cumberland City Council	 Briefing letter to provide an overview of the Project, invite feedback and opportunity to meet during Scoping Report and the EIS on 2 February 2023 and 9 August 2023. A meeting was held (via teleconference) on 29 August to discuss the Project. Email correspondence has occurred throughout the development of the EIS. 	 During the meeting, Cumberland City Council Pre-SEARs comments were discussed and reviewed to better understand the context of these comments. The two key requests from Cumberland City Council included: Request that the EIS consider the implications of flooding on users / customers of the BESS, safety and the environment Request that the EIS clarify how the BESS would interact / be managed with the SEF. 	 Councils flood advice letter and flood model was obtained from council. This was reviewed as part of the Water Assessment. The Water Impact Assessment considers the implications of the Project on flooding. An overview of how the Project would interact with the SEF is provided in the EIS. Cumberland City Council Pre-SEARs comments and how these have been addressed is included in the EIS.
Jemena	 Briefing letter to provide an overview of the Project, invite feedback and opportunity to meet during Scoping Report and the EIS on 22 February 2023 and 21 August 2023. A meeting was held (via teleconference) on 6 March 2023 and a follow up phone call occurred on 6 September to discuss the Project. Email correspondence has occurred throughout the development of the EIS. 	 Jemena accepts the Project subject to a safety management study being undertaken during detailed design and prior to construction. 	 A PHA has been developed specifically address potential hazard and risks associated with the Project. The Safety Management Study is an identified mitigation measure for the Project.
Visy	 Phone call 13 July 2023 and follow up email to provide overview of Project, approval detail and target submission dates. Face to face meeting and detailed presentation 10 August 2023 to outline Project in more detail. Weekly phone calls during August and September to provide Project developments land-owner consent, potential construction laydown areas and access. 	 Requested further information regarding contamination potential and management of unexpected contamination finds. 	 Contamination will be managed in accordance with the lease agreement. An assessment of contamination has been undertaken as part of the EIS. Land owners consent will be obtained prior to lodgement.
Kingspan	 Phone call 13 July 2023 and follow up email to provide overview of Project, approval detail and target submission dates. Face to face meeting and detailed presentation 30 August 2023 to outline the Project in more detail. Regular phone calls were made through the month of September 2023. 	 General support / endorsement for the Project subject to ongoing consultation, review of the EIS and implementation of mitigation measures. 	 Consultation to continue, including detailed planning regarding construction compound laydown and access.



Stakeholder	Consultation activities	Consultation outcomes	Action taken
Goodman	 Phone call 6 September and follow up email to provide overview of Project, approval detail and target submission dates. Phone call on 4 October to provide an update on design and clarity of submission timeframes. 	 General support / endorsement for the Project subject to ongoing consultation. 	 Consultation to continue based on feedback provided.
Wider community	 Door knock undertaken 30 August 2023 to residential properties within closest proximity to the Project (Cooper Crescent, Alt Street, Chisholm Street and Solo Crescent). A Project information letter was distributed to 361 residential properties within 750 metres of the Project site on 5 September 2023. The letter provided important information to residents informing the about the Project, the approval process, prospective key dates along with opportunities to provide feedback. The Iberdrola company website is continually reviewed and updated to include details about the Smithfield BESS and key details regarding the development timeline and opportunities to provide feedback. 	 Residents consulted were appreciative of being informed of the Project. Many residents contacted were neutral or in support of the Project. Key concerns based on discussions with the community include additional impacts to traffic along major routes as well as noise. General support / endorsement for the Project subject to ongoing consultation, review of the EIS and implementation of mitigation measures. 	 Newsletter containing information about the Project and Iberdrola was distributed throughout the wider community to inform them about the Project, as well as an opportunity to provide feedback via several methods (telephone hotline, email address and mailing list) to be kept informed of Project developments. A detailed assessment of potential traffic and noise related impacts is provided in the EIS.

4.3 Ongoing engagement

Ongoing consultation and engagement will also be undertaken through all future stages of the Project, including formal notification to be undertaken by DPE during the assessment period of the SSDA. This will provide further opportunities for the community and stakeholders to raise concerns. It will also provide Iberdrola opportunities to address these concerns and mitigate any negative socio-economic impacts resulting from the Project.

Iberdrola would continue to carry out consultation after the completion of the planning phase of the Project and into its construction and operational phases. Ongoing consultation would include, but not be limited to:

- Pre-commencement "job-fairs" to source local labour, suppliers and subcontractors and maximise local content
- Consultation in accordance with statutory requirements
- Ongoing consultation with key stakeholders, local council and other government agencies
- Provision of regular updates to nearby businesses and the community.

IMPACT ASSESSMENT AND PREDICTION



IMPACT ASSESSMENT AND PREDICTION 50

This chapter details the potential social impacts to arise from the Project. The assessment is informed by the analysis from the previous chapters and scoping of potential impacts using DPE's Social Impact Assessment Guidelines for State Significant Projects.

The method for the social impact assessment is described in Chapter 2.0. Each potential impact is assessed having regard for the level of impact, the likelihood of impact, and the significance of impact, and a social risk rating matrix (refer to Table 6).

5.1 Scoping

Should the Project be constructed, the social impacts that may arise would be influenced by:

- The social and geographic context of the Project Site
- The construction process, final built form, and operations of the Project
- Any measures put in place to mitigate against identified negative impacts and enhance positive impacts.

Social issues already in existence are relevant only as context, within which the impacts of the proposed subdivision must be examined. Issues have been assessed based on their impact during the construction and operational period of the development.

Social impacts can involve changes to:

- Way of life
- Community
- Access

Culture

- Health and wellbeing Surroundings
- Livelihoods
- Decision-making systems.

5.2 Area of influence

The social impacts to arise from the Project will be influenced by the existing situation, the eventual consequences of the Project, and measures put in place to mitigate against any negative impacts and enhance positive impacts.

Social issues already in existence are relevant only as context, within which the impacts of the proposed subdivision must be examined. The potential social impacts of the Project can extend beyond the immediate surroundings of the Project Site.

Issues have been assessed based on their impact during the construction and operational period of the development. The social impact matters are as stated in Chapter 2.0.

Table 19: Area of influence of potential impacts

Impact type	Meaning	Area of potential impact			
		Local Community	Broader Community		
Way of life	How people live, how they get around, how they work, how they play, and how they interact on a daily basis	Construction disturbanceNoiseLight pollution	 Increased truck movements on road network during construction 		
Community	Composition, character, cohesion, function, and sense of place	Introduction of new local workforce	• None		
Access	How people access and use infrastructure, services and facilities, whether provided by local, state, or federal governments, or by for-profit or not-for-profit organisations or groups	 Access to employment Construction vehicle movements On street parking availability 	Road congestion		
Culture	Both Aboriginal and non-Aboriginal culture, including shared beliefs,	 Potential impacts to European heritage items 	• None		



Impact type	Meaning	Area of potential impact		
		Local Community	Broader Community	
	customs, values, and stories, and connections to country, land, waterways, places, and buildings	 Potential impact to Aboriginal heritage items 		
Health and wellbeing	Physical and mental health, especially for those who are highly vulnerable to social exclusion or substantial change, plus wellbeing of individuals and communities	HealthAir qualitySafety	• None	
Surroundings	Access to, and use of, services that ecosystems provide, public safety and security, access to and use of the natural and built environment, and its aesthetic value and amenity	Visual impact and local characterPassive surveillance	 Visual impact and local character (for visitors) 	
Livelihoods	People's capacity to sustain themselves, whether they experience personal breach or disadvantage, and the distributive equity of impacts and benefits	 Job creation Increased local spending/flow on effects Development of site and more efficient use of infrastructure 	 Construction expenditure (direct and indirect) Operational expenditure (direct and indirect) 	
Decision making systems	Whether people experience procedural fairness; can make informed decisions; have power to influence decisions; and can access complaint, remedy and grievance mechanisms	 Feelings of exclusion from decision making processes 	 Feelings of exclusion from decision making processes 	

Each of the above impacts has been considered in the context of the area of influence, with findings outlined below.

5.3 Way of life

Way of life refers to how people live, how they get around, how they work, how they play, and how they interact on a daily basis. It can include impacts on people's daily routines caused by construction activities and/or operational arrangements. Impacts on people's commuting/travelling times, their experience of travel, and their ability to move around freely. Impacts on people's experience of privacy, peace, and quiet enjoyment, especially if affected by increased noise. Impacts on people's general experience of life in their community, especially if the project might cause a 'tipping point' of cumulative impacts on their lives (e.g. through property acquisitions, severance of communities, or major disruption during construction).

5.3.1 During construction

The construction process has the potential to affect the way of life of through disturbance to the neighbourhood and changes in amenity, particularly for sensitive receivers within the surrounding area, causing changes in routines and day to day activities. Sensitive receivers include residential properties but may also include child care centres, places of worship, community and recreational facilities, or businesses (such as cafés and restaurants) that rely on the amenity of a locality to attract customers.

During construction, the following may affect local amenity:

- The introduction of construction facilities
- Noise and dust arising from construction activities
- Unpleasant odours
- Increased traffic volumes and/or congestion.



These can have a range of impacts to way of life, including:

- Loss of peace and quiet for residents, workers, businesses and students living or working near the Project Site with consequential impacts to surroundings, way of life and health and wellbeing
- Loss of sleep for residents, particularly for shift workers
- Disturbance, inconvenience and safety concerns caused by construction vehicle movements and increased congestion on surrounding roads impacting travel times, access to services and livelihoods for residents, workers and businesses in the surrounds
- Potential for interruptions to daily life caused by interruptions to utilities service(s) for neighbouring residents and businesses
- Disturbance to workers (at nearby businesses or working from home) and students ability to concentrate with associated impacts to productivity and stress levels.

Construction impacts are by nature temporary, as they occur during the construction phase of the Project only. Construction impacts to amenity are generally experienced by receivers in close proximity to a construction site. As such, a short-term reduction in amenity may impact the neighbouring properties within the immediate vicinity of the Project Site. It would be appropriate for the proponent to engage in consultation with neighbouring occupants regularly throughout the construction period to inform them of construction timelines and potentially disruptive activities, with information about expectations of scale and severity and mitigation standards that will be met.

Construction of the Project is expected to commence in late 2024 (subject to approval) and take approximately 12 months to complete. The Project would be constructed within a single continuous construction period. Construction works would be undertaken during standard construction housings, including 7.00 am to 6.00 pm from Monday to Friday, 8.00 am to 1.00 pm on Saturday, with no works to be undertaken on Sunday and public holidays. Certain activities may be required outside of the standard construction hours, however key stakeholders would be informed prior to out of hours activities. Additionally, whilst standard construction hours may be beneficial in addressing concerns and potential amenity impacts in residential areas, impacts associated with construction works would be limited to times when workers and visitors would be likely to be attending the Project Site (i.e. during standard construction hours).

A Traffic Impact Assessment (TIA) has been prepared by Arcadis to accompany the proposal.⁶ The TIA states that the construction works for the BESS are expected to generate up to 30 light vehicle trips (two-way movements) during the construction AM and PM peak periods and 10 heavy vehicle trips (two-way movements) during the c ommuter AM and PM peak periods. No or minimal Oversize/Overmass (OSOM) vehicles are expected to be used for the delivery of plant to the Project Site. The intersection modelling results in the TIA showed that the traffic generated by the construction works is considered to have a minimal impact on the Cumberland Highway Long Street and Herbert Place intersection. Given the outcomes of the TIA, it is considered unlikely that traffic generation from construction works would negatively impact on the way of life of the surrounding community.

A Noise and Vibration Impact Assessment (NVIA) has been prepared for the Project by Benbow Environmental.⁷ Construction noise impacts are predicted to comply with the NSW Interim Construction Noise Criteria at all receivers. Additionally, vibration impacts are expected to be negligible. The NVIA also identified that existing noise mitigation measures are in place at the Project Site, including concrete noise protection walls of varying heights along the Project Site's boundaries. Considering the findings of the NVIA, impacts to community health and wellbeing resulting from noise and vibration impacts during the construction of the project are unlikely.

⁶ Arcadis (2023), Smithfield Battery Energy Storage System: Traffic Impact Assessment

⁷ Benbow Environmental (2023), Noise and Vibration Impact Assessment for Smithfield Energy Facility, 6 Herbert Place, Smithfield



5.3.2 During operation

The NVIA assessed the potential noise and vibration impacts of the Project during operations. The NVIA concluded that the Project does not significantly impact the existing environment and the Project Site is deemed suitable for the proposed use. As such, impacts to community health and wellbeing resulting from noise and vibration impacts during the operation of the Project are unlikely.

The TIA identifies that minimal vehicle movements are anticipated during the operation of the BESS. Operational traffic volumes will be significantly less than the Project's construction traffic and would result in minimal impacts to the traffic volumes on the road network. The Project would contribute to the employment of one additional employee during operation, primarily for scheduled maintenance. There would be up to 5 trips per day (5 inbound and 5 out-bound), comprising staff vehicles and heavy vehicles. As such, due to the minimal levels of traffic expected to be generated during operation of the Project, impacts to way of life are considered to be highly unlikely.

Potential impacts to way of life were raised by community stakeholders during community engagement undertaken for the Project. Key concerns based on discussions with the community included additional impacts to traffic along major routes and operational noise. However, it was noted that the majority of residents consulted were in support of the Project so long as the noise situation at the nearby recycling facility is not made any worse. Ultimately, community stakeholders expressed their general support for the Project subject to ongoing consultation, a review of the EIS and implementation of appropriate mitigation measures.

5.3.3 Mitigation and management

A range of mechanisms can be applied to minimise any potential construction impacts on amenity. Such mechanisms are typically required as a condition of development consent and are employed by most building contractors and implemented through a Construction Management Plan, which tend to focus on issues such as demolition and construction staging, noise, air and water quality, construction traffic management, pedestrian safety and site management. They can include simple but effective measures such as screening, noise mitigation at source and varying work hours. These mechanisms can be as simple as avoiding noisy or disruptive construction activities during the hours when residents are likely to want to enjoy surrounding open space or rest, for example on evenings and weekends.

A Construction Environmental Management Plan (CEMP) is proposed to be developed for the Project that details environmental management systems and processes for construction of the Project. The CEMP would provide the framework for the management of all potential environmental impacts resulting from the construction activities. The CEMP would be prepared based on the mitigation and management measures identified in this EIS and the Conditions of Approval.

The NVIA identifies several noise mitigation measures to be implemented during the construction phase, including:

- Consultation with nearby receivers
- On-site management
- Choosing appropriate plant and equipment, and maintaining regularly.

The NVIA also identifies noise mitigation measures to be implemented during the operational phase, including:

- An operational Noise Management Plan (NMP) should be developed to minimise the risk of adverse noise impacts during the operation of the facility
- A noise complaints procedure should be developed
- Noise monitoring should occur if complaints are received.

The TIA identifies that traffic management strategies can be introduced for both construction and operational phases to mitigate possible impacts on the transport network, including:



network operations

- Construction Traffic Management Plan managing hours of work and deliveries, staff transport and staff parking, with the provision of on-site tool storage where practicable
- Ongoing consultation with relevant authorities and neighbouring businesses.

5.4 Community

Community refers to the composition, character, cohesion, function, and sense of place that people experience. There are several aspects to community impacts, including:

- Composition: impacts on demographic characteristics and community structure. Can be changed by inmigration and out-migration over time, including the presence of newcomers and loss of longer term residents or sections of the community. Also, inflow/outflow of temporary residents (e.g. during construction).
- Character: Impacts on a community's shared identity and attributes, and natural and built features that people value. Can be affected by changes to buildings, vegetation, landscapes, land uses/industries, or land ownership and management.
- Cohesion and function: Impacts on social connections, interrelationships, networks and interactions, trust and cooperation, participation in community activities and institutions, and the potential for harmony or conflict. Lack of cohesion can result in social dislocation, alienation, division, dispossession, tensions, impoverishment, and crime.
- Sense of place: Impacts on feelings of belonging in a place, or identity with a place, which may derive from cultural or historical connections.

5.4.1 During construction

Whilst construction activities typically have the potential to impact upon the community's sense of place, due to the lower aesthetic value of the existing structures on site, it is not considered that the proposed construction activities would impact upon any of the matters considered under community. Proposed construction activities are also very unlikely to lead to separation of community groups.

By creating additional employment opportunities during construction, the Project would provide benefits to community cohesion and resilience by adding many opportunities for meaningful engagement in the workforce. The Project also creates more opportunities for residents in the area to work closer to home, thereby adding to time that they can spend with their families and in their communities. It is also considered unlikely that construction activities would have impacts on the community associated with impacts to Aboriginal or non-Aboriginal heritage values.

5.4.2 During operation

The Project concerns the construction of a BESS in an industrial area. As such, the Project is generally considered to be consistent with the locality and surrounding development and is located a sufficient distance away from residential development, thereby having a minimal effect on the community. The nearest locations where the community would meet and interact have been identified in section 3.6 and are located approximately 400 metres from the site. Additionally, no stakeholders highlighted concerns that related to community impacts.

5.4.3 Mitigation and management

As no significant community impacts have been identified, no specific mitigation or management mechanisms have been proposed.



5.5 Access

Access refers to how people access and use infrastructure, services and facilities, whether provided by local, state, or federal governments, or by for-profit or not-for-profit organisations or groups. It includes impacts on how people use roads and other access routes; severance, restrictions, and/or improvements in access. It also includes the impacts of a project (including project-related transport) on pedestrian routes and people's access to schools, medical services, community services, and businesses.

5.5.1 During construction

Construction activities have the potential to impact upon access to locations near the Project Site through temporary removed or changed access arrangements and changes to local parking.

Access to and from the Project Site during construction would be via the existing access point off Herbert Place. This access point would also be used as the operational entry point for vehicles. Vehicles associated with construction works would include light vehicles (workers travelling to and from the Project Site at the start and finish of shifts) and heavy vehicles delivering / removing construction materials, battery components and cooling system components. As identified in the EIS for the Project, the following maximum vehicle movements are predicted (subject to detailed design):

- An average of up to 30 passenger vehicles per day (30 in and 30 out) during the construction works phase
- An average of up to 15 heavy vehicles per day (15 in and 15 out) during the construction works phase
- Some OSOM vehicles during the construction works phase.

However, the average daily heavy vehicle movements during the construction phase are expected to be significantly lower than those outlined above as the delivery of enclosures is anticipated to occur in batches.

The construction workforce would include (but not be limited to) tradespeople and construction personnel, sub-contractor construction personnel, engineers, and functional and administrative staff. The EIS identifies that the construction workforce would be accommodated through existing parking within the SEF would be utilised (capacity of around 20 light vehicles), car parking within the proposed construction compound (anticipated to be for 10 light vehicles), and through the use of available on-street parking (in consultation with neighbouring landowners). The construction workforce is expected to use the existing parking facilities on site, and minimal impact on the on-street parking is expected by the construction of the BESS development. Additionally, minimal impact on the existing public or active transport facilities is anticipated by the construction of the BESS development, and no changes are required for bus and train services. The bus stops located within proximity of the Project Site will remain operational throughout the construction phase. As such, impacts of the Project on access to transport and parking during construction are considered to be unlikely.

Construction activities also have the potential to temporarily affect access to essential infrastructure, including gas, electricity, water, sewerage, and telecommunications. Although short-term impacts to neighbouring premises' ability to access utilities services may be possible during the construction phase of the project, any impacts would be short term and arranged with the affected parties in advance. Utility providers were contacted at the preliminary feedback stage, with no significant issues raised. Jemena has expressed support for the Project subject to a safety management study being undertaken during detailed design and prior to construction. In response, a PHA has been developed to specifically address potential hazard and risks associated with the Project and a Safety Management Study has been identified as a mitigation measure.

5.5.2 During operation

The Project would make no changes to the existing access arrangements in the locality. Vehicular traffic to the Project Site would be via existing roads, and there is unlikely to be obstruction on existing roads.

The TIA identifies that the *Cumberland Development Control Plan 2021* does not specify parking controls for energy infrastructure developments, such as the Project. The BESS would be operated remotely with a scheduled



maintenance and inspection program, and the existing workforce at the SEF and the additional scheduled maintenance personnel would be available to manage the BESS (currently four staff onsite) as required. Existing parking within the SEF would be utilised which has a capacity of around 20 light vehicles, and this would be sufficient to cater for the Project and existing SEF activities. Additionally, minimal impact on the existing public or active transport facilities is anticipated due to traffic generation from the BESS facility and no changes are required for bus and train services to facilitate the construction and operation of the facility. As such, the Project is considered unlikely to negatively impact on access to transport and parking during operations. Further, it is not anticipated that construction or operation of the Project would impact on access to services within the vicinity.

5.5.3 Mitigation and management

The TIA identifies traffic management strategies that can be introduces to mitigate impacts on access, including:

- Construction Traffic Management Plan managing hours of work and deliveries, staff transport and staff parking, with the provision of on-site tool storage where practicable
- Secondary alternative construction route activities should be determined as part of the Traffic Management Plan, in the event of the primary route is blocked off by an emergency.

5.6 Culture

Cultural impacts refer to both Aboriginal and non-Aboriginal culture, including shared beliefs, customs, values, and stories, and connections to country, land, waterways, places, and buildings. Specifically, it encompasses impacts on people's values, customs, and beliefs associated with (or embedded in) the Project Site or locality, e.g. as secondary effects of changes to scenic quality, landforms, or water flows. Strengthening of community values and culture through project design elements. There are also potential intangible cultural impacts, particularly concerning Aboriginal cultural heritage, with risks of 'cultural or spiritual loss' (i.e., loss or diminution of traditional attachment to the land or connection to country, or loss of rights to gain spiritual sustenance from the land).

5.6.1 During construction

Construction activities have the potential to impact on community and culture through impacts to Aboriginal and Non-Aboriginal historic cultural heritage. This is often through disturbance of archaeological items or otherwise culturally significant locations by construction activities.

It is considered highly unlikely that the Project would impact on Aboriginal cultural heritage values. The Scoping Report prepared for the Project identifies that a search of the DPE Aboriginal Heritage Information System (AHIMS) database was undertaken on 8 February 2023 to identify known areas of Aboriginal significance in proximity to the Project Site.⁸ The search identified no items of Aboriginal heritage significance within one kilometre of the Project Site. Additionally, Heritage NSW provided advice on the SEARs, dated 5 July 2023. Within this advice, Heritage NSW stated that the Project Site and immediate surrounds are heavily disturbed due to current land use practices, and it is highly unlikely that any Aboriginal cultural heritage would be impacted by the Project. As such, due to the high level of disturbance, existing industrial land use and small size of the Project footprint, Heritage NSW was of the view that an Aboriginal Cultural Heritage Assessment Report was not required.

In terms of Non-Aboriginal cultural heritage, the Scoping Report also identifies that on 8 February 2023, a desktop analysis was completed involving a review of the State Heritage Register, Transport and Sydney Waters' Section

⁸ Arcadis (2023), Smithfield Battery Energy Storage System: State Significant Development Scoping Report



170 Heritage and Conservation Registers, and Cumberland's Local Environmental Plans, which identified no known items of heritage significance within close proximity to the Project Site. It was further stated that the Project Site and its immediate surrounds been heavily disturbed due to the industrial nature of the surrounding land use. Therefore, it was considered highly unlikely that any heritage items would be uncovered during construction of the Project.

Based on the advice from Heritage NSW, it is therefore considered unlikely that the Project would have any impacts on culture through impacts Aboriginal and Non-Aboriginal heritage during construction.

5.6.2 During operation

None identified.

5.6.3 Mitigation and management

Due to the heavily disturbed nature of the Project Site, the Project is considered unlikely to have any impacts on culture through impacts Aboriginal and Non-Aboriginal heritage during construction. Nonetheless, it recommended that an unexpected finds policy is implemented throughout the construction phase of the project. In the event of any unexpected finds of Aboriginal sites, objects, or historical archaeological deposits being identified during construction, all work in the vicinity should cease immediately. A qualified archaeologist must be contacted to assess the find, and Heritage NSW and the NSW Aboriginal Land Council must be notified.

Owing to the minimal impact to culture assessed for the Project when operational, no additional mitigation or management strategies are proposed for operational impacts.

5.7 Health and wellbeing

Health and wellbeing concerns both physical and mental health, especially for those who are highly vulnerable to social exclusion or substantial change, plus wellbeing of individuals and communities.

This includes health impacts and well-founded concerns/fears about health impacts associated with noise, dust, odour, vibration, lighting, and toxic materials. It also includes:

- Stress, anxiety, and uncertainty or hopes about a Project, about changes to adjacent uses, and about cumulative change to a neighbourhood
- Psychological stress and fears/hopes for the future. Potential impact of the project on social behaviours such as alcohol/drug use, domestic or other violence
- Impacts of project elements on ability to sleep, people's general health and wellbeing, and overall community health.

5.7.1 During construction

Construction activities can produce a range of environmental disturbances that can produce social impacts, including:

- Loud and continuous noise or vibration disturbance from activities such as piling, cutting or drilling could impact upon nearby residents' health and wellbeing.
- Dust and unpleasant odours arising from exposed loads or the operation of machinery could impact upon air quality
- Residents and workers could also experience impacts to mental health caused by increased stress through loss of convenience caused by minor changes to traffic flows.

While potential impacts from construction will be temporary as they would be present only while construction is occurring, their intensity requires mitigations to minimise the impact. Construction impacts on local amenity are also generally contained within close proximity to a construction site.



Potential site contamination during construction may impact on community health. Construction of the BESS would result in exposure of the subsurface through general earthworks and excavation. However due to the low relief of the Project Site, minimal excavation and levelling works are required and related soil erosion is likely to be insignificant. It is also considered unlikely that acid sulphate soils would be encountered during construction. Impacts related to contamination are considered unlikely to be significant given the scale of the Project and as such, impacts to community health associated with site contamination are considered to be unlikely.

During construction, the storage or removal of dangerous goods has the potential to lower the overall levels of safety within an area. A Preliminary Hazard Analysis (PHA) was prepared by Sherpa Consulting for the Project, dated 25 August 2023.⁹ As part of the PHA, Sherpa Consulting reviewed approved PHA studies for the SEF and the existing power plant and confirmed that the quantities of dangerous goods (e.g. Class 8 water treatment che micals) were below the relevant SEPP screening threshold. As such, the potential for negative impacts on local w orkers' health and wellbeing resulting from the removal of dangerous goods is considered to be unlikely.

5.7.2 During operation

The Project, while relatively isolated from more sensitive residential land uses, could have potential health and wellbeing impacts to workers at surrounding businesses. Should the Project be constructed, it could also cause health hazards arising from the disturbance of any hazardous substances during the construction phase.

Developments can increase or decrease perceived and actual safety. The earlier investigation of the community identified crime hotspots for some crimes in the immediate vicinity of the Project Site, including for theft (break and enter non-dwelling), theft (motor vehicle) and domestic assault. Further analysis revealed that crime rates in Smithfield were generally higher than across the two comparison areas of Cumberland (LGA) and NSW. However, it is considered unlikely that the Project would have an impact on crime rates within the locality, particularly given its location within a site of existing development. It is also possible that the intensification of development on the Project Site, including through site improvements, may assist in providing passive surveillance in the area associated with worker movements.

The PHA prepared by Sherpa Consulting also identified the hazards and assess the risks associated with the operations of the Project. Of the event types that were identified in the PHA to have the potential for off-site impact, two were identified to be 'High' risk. These high-risk events related to fire with thermal and toxic gas impact for BESS modules located near the northern site boundary, and incident escalation involving BESS modules located opposite the high-pressure power station gas letdown station. However, the PHA concluded that through the implementation of the recommendations identified in the report, the resulting consequences from identified BESS events are not expected to have significant off-site impacts.

The storage of dangerous goods on-site during operations has the potential to lower the overall safety of an area. The PHA noted that the Project would utilise lithium-ion battery technology, with other materials considered as part of the *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* (SEPP 33) risk screening including transformer oil and battery coolant (indicatively ethylene glycol aqueous solution). However, these materials are not generally classified as dangerous goods and are not considered to be potentially hazardous under SEPP 33 if they are not stored with other flammable or reactive materials. As such, the potential risks to community health and wellbeing associated with the storage of dangerous goods onsite is low.

However, the Project is also likely to indirectly have positive impacts on community well-being. The Project is an energy-firming asset that will help to support a more reliable supply of energy to the community into the future. It would also support the transition to renewables and could therefore alleviate some fears surrounding the use

⁹ Sherpa Consulting (2023), Preliminary Hazard Analysis: Smithfield Battery Energy Storage System (BESS)



of fossil fuels and the changing climate. As such, the Project therefore has the potential to indirectly benefit the well-being of the broader community.

5.7.3 Mitigation and management

The TIA recommends traffic management strategies that can be introduced to improve safety around vehicle access points to the Project Site, such as:

- Relevant emergency services should be notified in advance prior to the movement of all hazardous/dangerous or oversized construction material and equipment
- Construction personnel will facilitate the ingress/egress of the plant delivery truck to ensure safety for all users along Herbert Place

The PHA also recommends the implementation of mitigations to reduce safety risks associated with the Project, including:

- Identify measures to minimise the offsite fatality potential from radiation and toxic gas effects from a full BESS module fire at the northern site boundary during the detailed design process
- Develop an Emergency Response Plan
- Implement measures to minimise the potential for a natural gas leak at the gas yard directed toward the BESS models
- Undertake a Final Hazard Analysis (FHA) for the chosen BESS type to confirm that the spacing and setback distances will minimise the potential for offsite radiation and toxic gas impacts
- Develop fire protection measures in consultation with Fire and Rescue NSW (FRNSW as part of the detailed design
- Include specified clearances as part of the final BESS facility layout.

5.8 Surroundings

Impacts to surroundings can include access to, and use of, services that ecosystems provide, public safety and security, access to and use of the natural and built environment, and its aesthetic value and amenity.

It extends to impacts on anything provided by the environment and that is useful for people, e.g. food and clean water supply, flood or fire defences. Impacts on safety of pedestrians, children, drivers, and cyclists. Impacts on levels of crime and violence, perceptions of crime, safety, and security, especially for women. Loss or enhancement of public spaces. Impacts on the perceived quality and uses of a natural or built area. Impacts on the valued features, the soundscape, and aesthetics of a place and how people use or appreciate it. The Project is appropriately located within an existing industrial area and as such, is consistent with the present and desired character of the immediate surrounds.

5.8.1 During construction

During construction, some activities may impact upon the ability of visitors and passers-by to access and enjoy their natural environment. Standard project measures such as appropriate temporary screening and hoarding will form part of the construction management plan and would mitigate these impacts on a temporary basis.

A Biodiversity Development Assessment Report (BDAR) waiver request was submitted by Arcadis on 22 June 2023.¹⁰ The BDAR waiver request identifies that the Project Site is situated within a highly urbanised environment and contains no native vegetation, and concluded that the Project would not have any impacts on biodiversity values. Subsequently, DPE determined that the application is not required to be accompanied by a BDAR as the

¹⁰ Arcadis (2023), Request to waiver requirement to prepare a Biodiversity Development Assessment Report



Project is not likely to have any significant impact on biodiversity values. As such, the Project is considered very unlikely to impact on the biodiversity values of the Project Site during construction.

5.8.2 During operation

The public domain plays an important role in supporting public and community life. Changes to the public domain can affect the experience of vehicles, pedestrians, and bicycle users as they pass a site. In this instance, there is minimal potential for the Project to impact on the public domain due to the location of the Project Site away from the road. Additionally, no social infrastructure identified near the Project Site (refer to section 3.6) would be impacted by a change to its built environment context.

Potential visual amenity impacts associated with the Project have been assessed as part of the EIS.¹¹ The assessment states that visual impacts from the construction of the Project are likely to be low due to the industrial setting in which heavy vehicles and plant and equipment are used. Once operational, it was determined that the Project would generally be consistent with the visual built form and visual character of the SEF and is not anticipated to result in substantial visual impacts to the surrounding receivers. In addition, the Project would generally represent a continuation of the surrounding character of the industrial area. It is also noted that no landscaping works are proposed as part of the Project.

The assessment in the EIS also reviewed the visual impacts of the Project from five viewpoint locations surrounding the Project Site, and found that the viewpoints would be subject to a low or negligible visual impact from the Project. It was further noted that night lighting will be located at the Project Site for security purposes, and the lighting would be designed to ensure that there is minimal impact on surrounding receivers consistent with the night lighting standards.

The operation of the BESS also has the potential to negatively impact on the surroundings. The PHA prepared by Sherpa Consulting identifies that due to the proximity of the BESS modules near northern boundary of the Project Site, a fire (from battery specific failure modes) and/or toxic gas generation could result in offsite fatality and injury impacts. However, these risks are considered to be effectively mitigated though the implementation of mitigation measures as identified in the following section, thereby reducing the risks to the surroundings.

5.8.3 Mitigation and management

The EIS identifies the following visual amenity mitigation measures to reduce the visual impacts of the Project:

- Cut off and direct light fittings (or similar technologies) would be used where appropriate to minimise glare and light spill onto private property
- External lighting design would be consistent with AS/NZS 1680.5:2012 Australian and New Zealand Interior and workplace, Part 5: Outdoor workplace lighting and AS 4282-1997 Control of the obtrusive effects of outdoor lighting.

The PHA has recommended several mitigation measures to be considered in the detailed design of the Project that would reduce the likelihood of offsite impacts. This includes:

- Implementing the required separation and setback distances for the BESS units
- Incorporating a fire wall along the northern boundary

5.9 Livelihoods

A person's livelihood is their capacity to sustain themselves, whether they experience personal breach or disadvantage, and the distributive equity of impacts and benefits. It can include change in livelihood from new employment and business opportunities (positive), or from disruption during construction (negative). For

¹¹ Arcadis (2023), Smithfield Battery Energy Storage System: Environmental Impact Statement



Aboriginal people, it also includes rights to land and to gain spiritual and cultural sustenance from the land. The Project would affect the local and regional economy both during construction and operation. The extents of economic effects are discussed in the following sections.

5.9.1 During construction

The construction of the development would be expected to have short and long-term benefits with respect to construction employment and the purchase of materials. During construction, it is anticipated that the Project would generate additional jobs, with indirect benefits flowing to local businesses as workers spend on local services (e.g. food and beverage, other services). The construction industry has strong linkages with other sectors, so its impact on the economy goes further than the direct contribution of construction. The procurements of construction materials would be one such activity generator.

A Capital Investment Value (CIV) estimate has been prepared by Arcadis for the Project, dated 15 August 2023.¹² The CIV for the construction of the Project is estimated at approximately \$93 million. Based off the CIV and as part of the Economic Impact Assessment (EIA), HillPDA has estimated that construction activity associated with the Project would generate the following economic outputs over the construction period:

- Directly supporting employment of 81 full time jobs years and delivering a direct value-add of \$37 million to the economy
- Indirectly supporting employment of 217 full time job years and delivering an indirect value-add of \$70 million to the economy.

5.9.2 During operation

The Project Site currently supports 4 Full-time Equivalent (FTE) jobs to operate the existing SEF. The SEF is also s upported by a 24/7 operations control centre which is run remotely by Iberdrola. HillPDA has estimated that up on operation of Project, the Project Site would directly generate 5 FTE jobs, resulting in an increase of 1 FTE job over what is currently generated on the Project Site. As part of the EIA, HillPDA has also estimated that the Proje ct would generate the following net economic outputs during its operational phase, which would provide positive outcomes to livelihoods:

- Directly supporting employment of 1 FTE jobs and delivering a direct value-add of \$0.5 million annually to the economy
- Indirectly supporting employment of 6 FTE jobs and delivering an indirect value-add of \$0.8 million annually million to the economy.

5.9.3 Mitigation and management

The Project stands to make a positive contribution to the livelihood of residents across the wider region, increasing employment opportunities on site during construction, closer to residents' homes. As such, no mitigations are proposed.

5.10 Decision making systems

Decision making systems concerns whether people:

- Experience procedural fairness
- Can make informed decisions
- Have power to influence decisions
- Can access complaint, remedy and grievance mechanisms.

¹² Arcadis (2023), Iberdrola Battery Energy Storage System – CIV Estimate



It concerns matters like the capacity of affected people to influence project decisions, including elements of project design and:

- Extent to which they can navigate large amounts of technical material and make informed decisions
- Effectiveness of engagement mechanisms at enabling all groups (especially vulnerable or marginalised groups) to participate in the assessment process. Levels of trust in the rigour and impartiality of the assessment process
- Extent to which people feel empowered to determine their futures, including after a project closes
- Opportunities for people to have a say in the project's community investment decisions
- Accessibility and effectiveness of complaint and remedy procedures/mechanisms.

5.10.1 During construction

During the construction process, there is a potential for people to feel powerless or that they have a lack of means to have input or say on the Project. In the case of this Project, owing to the reduced scale of the change, the surrounding community is less likely to experience this feeling of powerlessness. Furthermore, the Project has had a targeted engagement process, which has approached neighbouring residents and businesses for input.

5.10.2 During operation

It is not anticipated the Project would introduce additional fears relating to decision making systems above the baseline. Notwithstanding, a range of mitigations and enhancements are proposed below.

5.10.3 Mitigation and management

A Stakeholder Management Plan (SMP) should be implemented at the construction phase, which should provide for triggers to notify neighbours of disruptive construction activity, with minimum notice periods to allow neighbours to prepare. It would also nominate a single point of contact for neighbours with issues or concerns.

An Operational Environmental Management Plan (OEMP) will be prepared to provide the overarching framework for the management of all potential impacts resulting from the operation of the Project. The OEMP should include measures to minimise impacts of operational activities to surrounding occupants and occupants within the Project Site and identify a clear participatory structure for residents to make suggestions or raise issues in the operation of the Project. This process should be transparent, with clear timeframes for resolution of matters. The OEMP should also identify a transparent process for resolving complaints by neighbours and community members.



5.11 Evaluation of impacts

5.11.1 Construction

This section considers impacts that may occur during the construction phase. An evaluation of social impacts and the proposed mitigation response during the construction phase is summarised in Table 20.

Table 20: Construction	n phase: socia	l impact evaluation	and mitigation	response
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Detail Evaluated		itandard measures Project-specific mitigation measures		Residual impact significance
Way of life				
Additional construction vehicle movements may increase congestion on surrounding roads, impacting way of life, access and livelihoods for surrounding residents, workers, and businesses.	Unlikely + Minor = Low (negative)	 Manage access to/from adjacent properties. Restrict construction vehicle movements to designated routes to/from the Project Site. Manage and control construction vehicle activity in the vicinity of the Project 	 Implementation of traffic management strategies identified in the TIA, including: Construction Traffic Management Plan managing hours of 	Unlikely + Minor = Low (negative)
Impacts to surrounding businesses and pedestrians from changed access during construction, potentially affecting way of life and access.	Unlikely + Minor = Low (negative)	 Provide an appropriate and convenient environment for pedestrians and minimise the impact on pedestrian movements. Maintain appropriate capacity for pedestrians at all times on footpaths adjacent to the Project Site. Maintain appropriate public transport access. Carry out demolition activity in accordance with the approved work hours. 	 work and deliveries, staff transport and staff parking, with the provision of on-site tool storage where practicable Ongoing consultation with relevant authorities and neighbouring businesses. The movement of all construction vehicles will be restricted to designated routes and confined to the regional road network. 	Unlikely + Minor = Low (negative)



Detail	Evaluated	Standard measures	Project-specific mitigation measures	Residual impact significance
Noise and vibration from construction activity may negatively affect amenity for residents, workers and businesses surrounding the Project Site, impacting upon quiet enjoyment of surroundings, way of life and health and wellbeing. This impact is most likely to affect workers at neighbouring businesses.	Unlikely + Minor = Low (negative)	 When planning construction work that will generate significant noise or vibration, consider: Substitution by an alternative process. Restricting times when work is carried out. Screening or enclosures. Utilisation of temporary supports, where deemed necessary. Carry out demolition activity in accordance with the approved work hours. 	 Implement the recommended mitigation measures from the Noise and Vibration Impact Assessment including: Consultation with nearby receivers On-site management Selecting appropriate plant and equipment, and maintaining regularly. 	Unlikely + Minor = Low (negative)
Community				
None identified				



Detail Evaluated		Standard measures	Project-specific mitigation measures	Residual impact significance
Access				
Potential changes to access for surrounding businesses and residences (including from parking for workers on site) during construction, impacting on accessibility	 Ensure dedicated parking is provided for workers, or that they are encouraged to travel via alternative means (e.g. public transport, shuttle to external parking site). 	• Ensure dedicated parking is provided for workers, or that they are encouraged to travel via alternative means (e.g. public transport, shuttle to external parking site).	 Parking for the construction workforce to be provided in line with the following: Existing parking within the SEF would be utilised (capacity of around 20 light vehicles) Car parking within the proposed construction compound (anticipated to be for 10 light vehicles) Additional parking needs to be determined in consultation with neighbouring landowners (note: separate parking area adjacent to the site is being negotiated between the Proponent and Visy). Implementation of traffic management strategies identified in the TIA, including: Construction Traffic Management Plan managing hours of work and deliveries, staff transport and staff parking, with the provision of on-site tool storage where practicable Secondary alternative construction route activities should be determined as part of the Traffic Management Plan, in the event of the primary route is blocked off by an emergency. 	Unlikely + Minor = Low (negative)
Culture				
Potential impact on community and culture through fear of impacts to Aboriginal cultural heritage sites during construction.	Very unlikely + Minor = Low (negative)	• None	• Implementation of an unexpected finds policy throughout the construction phase of the Project.	Very unlikely + Minor = Low (negative)
Potential impact on local cultural values through fear of impacts to historical cultural heritage sites during construction.	Very unlikely + Minimal = Low (negative)	• None	 Implementation of an unexpected finds policy throughout the construction phase of the Project. 	Very unlikely + Minimal = Low (negative)



Detail	Evaluated	Standard measures	Project-specific mitigation measures	Residual impact significance
Health and wellbeing				
Dust from construction activity could cause a decline in air quality, potentially impacting the amenity of surroundings and health and wellbeing of neighbouring residents and workers. Release of hazardous building materials during construction could potentially impact the health and wellbeing of neighbouring residents and workers.	Unlikely + Minor = Low (negative)	 Construction phase air quality impacts to be minimised or avoided by incorporation of appropriate dust suppression and air quality control measures at various stages of the project. 	• None	Unlikely + Minor = Low (negative)
Potential for increased safety risks to local workers during the construction phase, associated with undertaking construction activities at the Project site.	Possible + Minor = Medium (negative)	• None	 Implementation of traffic management strategies identified in the TIA, including: Relevant emergency services should be notified in advance prior to the movement of all hazardous/dangerous or oversized construction material and equipment Construction personnel will facilitate the ingress/egress of the plant delivery truck to ensure safety for all users along Herbert Place 	Unlikely + Minor = Low (negative)
Potential for negative impacts on local workers' health and wellbeing, resulting from the removal of dangerous goods, which could potentially lower the overall levels of safety of the area.	Unlikely + Minor = Low (negative)	 Ensure relevant standards are adhered to in the storage of dangerous goods. 	 Adhere to the findings of the Preliminary Hazard Analysis prepared by Sherpa Consulting. 	Unlikely + Minor = Low (negative)
Surroundings				
None identified.				
Livelihoods				



Detail	Evaluated	Standard measures	Project-specific mitigation measures	Residual impact significance
Additional employment opportunities on site arising from construction activity (direct and indirect) positively impacting livelihoods	Likely + Moderate = High (positive)	 Construction activity will draw resources from surrounding areas and thereby generate economic activity in the Cumberland LGA as well as from outside the LGA. 	 HillPDA has estimated that construction activity will: Directly support employment of 81 full time jobs years and deliver a direct value-add of \$37 million to the economy Indirectly support employment of 217 full time job years and deliver an indirect value-add of \$70 million to the economy. 	Likely + Moderate = High (positive)
Decision making systems				
Potential feeling of powerlessness or lack of means to have input or say on the Project during construction for surrounding properties and the wide community, negatively impacting decision-making systems	Possible + Minor = Medium (negative)	 Standard engagement mechanisms as part of SSDA process 	 Implementation of a Stakeholder Management Plan (SMP) to address the implementation of project specific mitigation and management strategies in order to minimise the potential for negative impacts on the community in and around the construction site. 	Unlikely + Minor = Low (negative)



5.11.2 Operation

This section considers impacts that may occur once construction is completed and the development is occupied and in operation. An evaluation of social impacts and the proposed mitigation response during the operational phase is summarised in Table 21.

Table 21: Operation phase: social impact evaluation and mitigation response

Detail	Evaluated	Standard measures	Project-specific mitigation measures	Residual impact significance
Way of life				
Noise emissions from the operation of the facility could potentially impact residents, workers, and businesses (on site and surrounding) enjoyment of surroundings, way of life and health and wellbeing	Unlikely + Minor = Low (negative)	 Locating mechanical equipment as far as practicable from noise sensitive receivers Using in-duct treatments such as internally lined ductwork or silencers Building barriers or enclosures around equipment. 	 Implement the recommended mitigation measures from the Noise and Vibration Impact Assessment including: An operational Noise Management Plan (NMP) should be developed to minimise the risk of adverse noise impacts during the operation of the facility A noise complaints procedure should be developed Noise monitoring should occur if complaints are received. 	Unlikely + Minor = Low (negative)
Community				
None identified				
Access				
Impact to surrounding parking availability from on-site uses, impacting accessibility and way of life for surrounding residents, workers and visitors, and livelihoods for nearby businesses who rely on existing parking.	Unlikely + Minor = Low (negative)	 Parking to be constructed in line with relevant requirements for the uses on site Information regarding public transport options is to be made available for workers on site. 	• The <i>Cumberland Development Control Plan 2021</i> does not specify parking controls for energy infrastructure developments, such as the Project. However, existing parking within the SEF would be utilised, which has a capacity of around 20 light vehicles, and this would be sufficient to cater for the Project and existing SEF activities.	Very unlikely + Minimal = Low (negative)
Culture				
None identified				
Health and wellbeing				
Potential for negative impacts on local workers' health and wellbeing resulting from the storage of dangerous goods, which could potentially lower the overall safety of the area.	Unlikely + Minor = Low (negative)	 Ensure relevant standards are adhered to in the storage of dangerous goods. 	 Adhere to the findings of the Preliminary Hazard Analysis prepared by Sherpa Consulting. 	Unlikely + Minor = Low (negative)



Detail	Evaluated	Standard measures	asures Project-specific mitigation measures	
Potential for increased risks to the health and safety of surrounding workers and residents associated with the operation of the BESS (e.g. fire involving the lithium-ion battery to start at the Project Site with the potential to spread offsite)	Unlikely + Moderate = Medium (negative)	• None	 Implementation of mitigation measures identified as part of the PHA: Identify measures to minimise the offsite fatality potential from radiation and toxic gas effects from a full BESS module fire at the northern site boundary during the detailed design process Develop an Emergency Response Plan Implement measures to minimise the potential for a natural gas leak at the gas yard directed toward the BESS models Undertake a Final Hazard Analysis (FHA) for the chosen BESS type to confirm that the spacing and setback distances will minimise the potential for offsite radiation and toxic gas impacts Develop fire protection measures in consultation with Fire and Rescue NSW (FRNSW as part of the detailed design Include specified clearances as part of the final BESS facility layout. 	
Surroundings				
Improvements to the surroundings, which could improve feelings of safety for residents and workers in the area, due to increased activity and passive surveillance surrounding the Project Site.	Possible + Minimal = Low (positive)	• None (positive)	• None (positive)	Possible + Minimal = Low (positive)
Potential impacts to the surroundings (and community) for local residents through visual impacts and changes to visual amenity associated with the Project.	Likely + Minimal = Low (negative)	• None	 Implementation of the following visual amenity mitigation measures identified in the EIS: Cut off and direct light fittings (or similar technologies) would be used where appropriate to minimise glare and light spill onto private property External lighting design would be consistent with AS/NZS 1680.5:2012 Australian and New Zealand Interior and workplace, Part 5: Outdoor workplace lighting and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. 	
Potential for a fire (from battery specific failure modes) and/or toxic gas generation result in offsite impacts, including impacts to the surroundings.	Unlikely + Moderate = Medium (negative)	• None	 Implementation of recommended mitigation measures identified in the PHA to reduce the likelihood of offsite impacts, including: Implementing the required separation and setback distances for the BESS units Incorporating a fire wall along the northern boundary 	Very unlikely + Minor = Low (negative)



Detail	Evaluated	Standard measures	Project-specific mitigation measures	Residual impact
				significance
Livelihoods				
Additional employment opportunities on site arising from operational activity (direct and indirect) positively impacting livelihoods	Likely + Minimal = Low (positive)	• None (positive)	 HillPDA has estimated that the operation of the Project will: Directly support employment of 1 FTE jobs and deliver a direct value-add of \$0.5 million annually to the economy Indirectly support employment of 6 FTE jobs and deliver an indirect value-add of \$0.8 million annually million to the economy. 	Likely + Minimal = Low (positive)
Decision making systems				
Potential feeling of powerlessness or lack of means to have input or say during operations, negatively impacting decision-making systems	Unlikely + Minor = Low (negative)	• N/A	 The POM should identify a transparent process for resolving complaints by neighbours and community members. This process should be transparent, with clear timeframes for resolution of matters. 	Unlikely + Minor = Low (negative)

ENHANCEMENT, MITIGATION AND RESIDUAL IMPACTS



6.0 ENHANCEMENT, MITIGATION AND RESIDUAL IMPACTS

Activities associated with the construction and operation of the Project have the potential to be disruptive to the day-to-day lives of residents, workers, visitors and businesses in the surrounds. However, these activities can be effectively mitigated through the implementation of a range of measures, as well effective coordination and planning of potentially disruptive activities.

The potential social impacts that could result from the construction and operation of the Project are generally considered to have been sufficiently mitigated:

- The impacts to health, wellbeing and amenity arising from the construction of the Project would generally be well-mitigated by standard mitigation measures, combined with the Project Site's location in an existing industrial area and a substantial distance from sensitive receivers including residential land uses and social infrastructure facilities. Construction works would also be restricted to within standard construction hours.
- Potential impacts of construction traffic on the community would also be mitigated through the implementation of relevant traffic management strategies outlined in the TIA.
- Impacts to access are unlikely as the Project would make no changes to the existing access arrangements in the locality, and vehicular access to the Project Site will be via the existing access point off Herbert Place. Sufficient parking for the construction workforce is also expected to be provided on-site.
- Potential impacts to health and safety associated with the introduction of the BESS on the Project Site would be mitigated through detailed design development with consideration of set back distances and engineering controls.
- Impacts associated with noise are unlikely, though existing noise mitigation measures are in place which include noise walls of varying heights around the boundaries of the Project Site.
- Impacts to culture through damage to items of Aboriginal or historical significance were found to be highly unlikely due to the extremely disturbed nature of the Project Site, though it is recommended that an unexpected finds procedure be implemented should unexpected finds occur during construction.

There are also several social benefits that would arise from the Project proceeding:

- The Project would contribute positively to livelihoods and social cohesion through the generation of new employment opportunities, including:
 - 298 FTE jobs (direct and indirect) during the construction phase
 - 7 FTE jobs (direct and indirect) during the operation phase.
- Increased efficiency of use of an existing industrial site within an established industrial precinct, and increased economic investment in the precinct.
- Flow-on benefits to other local businesses from the increased number of workers in the local area.

As such, the majority of potential negative social impacts that may arise from construction and operation of the Project are considered to be well-mitigated.

CONCLUSION



7.0 CONCLUSION

This report has assessed the potential social and economic impacts arising from the SSDA for the construction and operation of a BESS at 6 Herbert Place, Smithfield.

The analysis has examined the Project Site and its surrounds, as well as its social context, noting that:

- The Project Site is located in Smithfield in the Cumberland LGA and is predominantly surrounded by other industrial developments within the Smithfield Industrial Estate.
- The nearest residential receivers are located approximately 400 metres to the south of the site, on the southern side of Prospect Creek. There is limited social infrastructure in proximity to the Project Site, with the nearest social infrastructure facilities being several parks located approximately 400 metres from the Project Site. These are unlikely to be impacted by the Project.
- Relevant government agencies, neighbouring premises, and other stakeholders were provided opportunity to comment on the Project, with no major issues identified.
- Key concerns identified through community engagement included additional impacts to traffic along major routes and operational noise. However, the majority of residents consulted were in support of the Project so long as the noise emissions from the nearby recycling facility were not made any worse.
- Crime hotspots for theft (break and enter non-dwelling), theft (motor vehicle) and domestic assault were identified within 800 metres of the Project Site.
- Analysis of crime data has revealed that rates for these crimes in Smithfield (SAL) were generally higher than across the two comparison areas of Cumberland (LGA) and NSW. However, it is considered unlikely that the Project would have an impact on crime rates within the locality, particularly given its location within a site of existing development.

Potential negative social impacts are centred around reductions in amenity and enjoyment of surroundings associated with the construction phase of the Project (e.g. due to noise, dust), which could be experienced by workers at neighbouring businesses. Once operational, there is a potential to be minor negative social impacts to the surroundings, alongside a slight increase to health and safety risks of surrounding workers and residents associated with the introduction of a BESS on the site. However, the social risks from the construction of the Project were found to be mostly able to be effectively mitigated through the application of appropriate measures, including through the implementation of a CEMP during construction and an OEMP during operations.

The Project was also found to have positive social impacts through the creation of an estimated 298 full time job years (direct and indirect) on site during construction, and 7 full time job years (direct and indirect) during operations. Additionally, the construction industry is known to be a significant driver of economic activity and employment, and any expenditure in this industry has flow-on effects to other areas of the economy. The Project would therefore benefit the wider local and regional economy in this manner. The Project would also allow for a more efficient use of an existing industrial site within an established industrial precinct, reducing the need for 'greenfield' industrial land. The additional workers at the Project Site during construction would likely also provide flow-on benefits to other local businesses, providing social benefits the local community.

Therefore, it has been determined that the Project would have positive social impacts, whilst potential negative social impacts of the Project can largely be managed with the implementation of appropriate mitigation measures. With consideration of the above potential impacts and benefits, this assessment concludes that the SSDA would produce an overall benefit to the local social environment and is supported.





APPENDIX A : SIA REVIEW QUESTIONS

Appendix C of the *Social Impact Assessment Guideline for State Significant Projects* sets out review questions. This appendix indicates where the required information sits within this report.

Table 22: SIA	review	questions	and re	elevant r	eport s	ections

	Impact area	Section
Ge	neral	
1	Does the lead author meet the qualification and experience requirements?	Yes, see declaration page at beginning of report
2	Has the lead author of provided a signed declaration?	Yes, see declaration page at beginning of report Yes, HillPDA has been engaged as
3	Would a reasonable person judge the SIA report to be impartial, rigorous, and transparent?	an independent expert and Chapter 2.0 details the approach taken
Pro	ject's social locality and social baseline	
4	Does the SIA report identify and describe all the different social groups that may be affected by the project?	Yes, Chapter 3.0
5	Does the SIA report identify and describe all the built or natural features that have value or importance for people, and explain why people value those features?	Yes, Chapter 3.0
6	Does the SIA report identify and describe historical, current, and expected social trends or social changes for people in the locality, including their experiences with this project and other major development projects?	Yes, Chapter 3.0
7	Does the social baseline study include appropriate justification for each element, and provide evidence that the elements reflect both relevant literature and the diversity of views and likely experiences?	Yes, Chapter 3.0
8	Does the social baseline study demonstrate social-science research methods and explain any significant methodological or data limitations?	Yes, Chapters 2.0 and 3.0
Ide	ntification and description of social impacts	
9	Does the SIA report adequately describe likely social impacts from the perspectives of how people may experience them, and explain the research used to identify them? When undertaken as a part of SIA scoping and initial assessment, has the plan for the SIA report been detailed?	Yes, the method and approach for preparing the SIA is described in Chapter 2.0
10	Does the SIA report apply the precautionary principle to identifying social impacts, and consider how they may be experienced differently by different people and groups?	Yes, the precautionary principle is applied in Chapter 5.0
11	Does the SIA report describe how the preliminary analysis influenced both the project design and EIS Engagement Strategy?	Yes, the design of the engagement approach is summarised in Chapter 4.0.
Co	mmunity engagement	
12	Were the extent and nature of engagement activities appropriate and sufficient to canvass all relevant views, including those of vulnerable or marginalised groups?	Yes, Chapter 5.0
13	How have the views, concerns and insights of affected and interested people influenced both the project design and each element of the SIA report?	Outcomes including changes arising from engagement are described in Chapter 4.0.
Pre	dicting and analysing social impacts	
14	Does the SIA report impartially focus on the most important social impacts to people at all stages of the project, without any omissions or misrepresentations?	Yes, Chapter 5.0
15	Does the SIA report analyse the distribution of both positive and negative social impacts, and identify who will benefit and who will lose from the project?	Yes, Chapter 5.0
16	Does the SIA report identify its assumptions, and include sensitivity analysis and alternative scenarios? (including 'worst-case' and 'no project' scenarios where relevant)	Yes, Chapter 5.0



	Impact area	Section						
Eva	luating significance							
17	Do the evaluations of significance of social impacts impartially represent how people in each identified social group can expect to experience the project, including any cumulative effects?	Yes, Chapter 5.0						
18	Are the evaluations of significance disaggregated to consider the likely different experiences for different people or groups, especially vulnerable groups?	Yes, however no significant impacts to vulnerable groups have been identified						
Res	Responses, monitoring and management							
19	Does the SIA report propose responses that are tangible, deliverable, likely to be durably effective, directly related to the respective impact(s) and adequately delegated and resourced?	Yes, Chapters 5.0 and 6.0						
20	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?	HillPDA has been engaged as an independent expert. Evidence presented here is from impartial sources						
21	Does the SIA report demonstrate how the proponent will adaptively manage social impacts and respond to unanticipated events, breaches, grievances and non-compliance?	The SIA identifies a need for ongoing monitoring and proposes a coordinated approach as part of the day-to-day operation of the Project Site in Chapter 6.0						



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