Response to public submissions and referral agency comments on Crown Development Application 25004790 for Part 2 of the Gillman Spoil Reuse Facility

2 June 2025

For the attention of: Gabrielle McMahon

Dear Ms McMahon

Thank you for the opportunity to respond to submissions received during the public notification period for the Crown Development Application for Part 2 of the Gillman Spoil Reuse Facility (SRF) associated with the River Torrens to Darlington (T2D) Project. Three submissions were received from:

- Friends of Port River (FoPR);
- Port Adelaide Residents Environment Protection Group (PAREPG) – an amended submission was received 23 April 2025, which has been used to determine the response; and
- Mr Barry Crook.

The application was also referred to several agencies, both formally and informally, with responses received as follows:

- Department for Energy and Mining (DEM) received 1 April 2025.
- Commissioner of Highways (Commissioner) 29 April 2025.
- Environment Protection Authority (EPA) 29 April 2025.
- City of Port Adelaide Enfield (Council) 22 April 2025.
- Coast Protection Board (Board) 6 May 2025.

No response was received from the Department for Environment and Water (DEW), which was referred the application on account of the Adelaide Dolphin Sanctuary that covers the Barker Inlet to the north of the subject land.

On behalf of the Department for Infrastructure and Transport (the Department), I have considered the issues raised in the public submissions and there is commonality with issues or comments in referral agency responses. As such, I have elected to provide a consolidated response by issue or theme, with reference to the party or parties that raised relevant comments.

In compiling my response, I have had follow up discussions with representatives of the Board to discuss their comments, particularly in relation to the impacts on coastal biodiversity, flooding and site hydrology.

State Commission Assessment Panel C/- State Assessment Planning and Land Use Services Department of Housing and Urban Development GPO Box 1815 ADELAIDE SA 5001

Your Reference 25004790

Our Reference 426165-037

Mott MacDonald Level 17, One Festival Tower Station Road Adelaide SA 5000 Australia

T +61 (0)8 7325 7325 mottmac.com

Mott MacDonald Australia Pty Limited is a subsidiary of Mott MacDonald International Limited. Registered in Australia, ABN 13 134 120 353

1 Notice of Public Notification

The submissions from FoPR and PAREPG criticise the Department for not providing notification of the development application to either group. I acknowledge that direct notice was not provided to FoPR and PAREPG, which was an oversight in the lodging of the application.

However, the application lodged with the State Planning Commission was subject to the public notification process for Crown development applications as required by section 131 of the *Planning, Development and Infrastructure Act 2016* (PDI Act) and *Practice Direction 13 – Notification of Crown and Essential Infrastructure Development Applications 2023.* The statutory obligations for public notification have been met, including advertisement in *The Advertiser* newspaper, publishing of application details on the SA Planning Portal, and the placement of public notices on the land (on Eastern Parade and Hanson Road). The public notice period was also 20 business days rather than the required 15 business days.

Notwithstanding the lack of direct notice, I would suggest that the Department had been clear in the Part 1 application, which also received submissions from FoPR and PAREPG, and in the Part 1 application hearing of the State Commission Assessment Panel (SCAP) on 30 October 2024 attended by the representors, that there would be a second application for Part 2. The SA Planning Portal provides a mechanism to subscribe to notified developments, which can be narrowed to specific council areas and suburbs of interest. I would encourage FoPR and PAREPG to utilise this feature in the future to ensure it is alerted to all developments for which they may have an interest.

2 Transparency of the EHIAR

Both FoPR and PAREPG note that the Environment and Heritage Impact Assessment Report (EHIAR) for the Gillman SRF is not publicly available and assert that this reflects a lack of transparency by the Department.

The EHIAR has been prepared by the Department in accordance with its Environment and Heritage Technical Manual (EHTM), which is a compilation of the Department's key guidelines and standards relating to the assessment and management of environmental and heritage components of road, rail, marine or other infrastructure projects. The EHTM provides guidance on how to deliver the requirements of the Department's Master Specification, which is incorporated into contract documentation and details minimum requirements/expectations for contractors delivering construction projects for the Department.

While the preparation of an EHIAR follows a similar pathway to statutory processes, it is not itself a statutory document and is not intended to replace applicable approval processes. This includes the Crown development assessment process under the PDI Act, the native vegetation clearance application process under the *Native Vegetation Act 1991* (NV Act) or the environmental assessment process under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Rather, the EHIAR is used to supplement these statutory processes, which has occurred in relation to the current and previous development applications.

The EHTM outlines that a public EHIAR is not usually required when the project is being assessed under other statutory processes. Accordingly, the EHIAR for the Gillman SRF has not been released publicly, nor has it been provided for consideration by the SCAP and the Minister for Planning as part of the Part 2 development application, notwithstanding the Board referring to the EHIAR in its consideration of this application. Instead, significant effort was put into providing appropriate levels of detail in the Planning Report to enable an informed assessment to be made having regard to:

- relevant provisions of the Planning and Design Code (the Code);
- environmental matters, including those raised by FoPR, PAREPG, Council, the Board and the EPA in relation to the Part 1 development application;
- comments by SCAP members at the hearing for the previous application; and
- the approval conditions imposed by the Minister for Part 1.

Where appropriate and relevant to the assessment, specific supporting reports for the EHIAR were provided with the development application, including the EPBC Act Self-Assessment, Detailed Site Investigations and Flood Modelling. I would note that while there have been a range of comments from referral agencies, there have been no requests for further information from any, nor from you as the assessing planner, reflecting the level of information provided with the application.

3 Land use alignment with planning instruments and lost opportunity for blue carbon

The submissions from FoPR and Council suggest that the proposal does not align with *State Planning Policy 5: Climate Change* (SPP5) or the Gillman Subzone policies relating to land intended for stormwater management and habitat rehabilitation. FoPR, PAREPG and Council all state that the Gillman area is ideal for developing blue carbon storage for Adelaide, the opportunity for which would be lost by the proposed development.

State Planning Policies (SPPs) collectively set out the State's overarching goals or requirements for the planning system, including climate change in SPP5. SPPs are given effect by other planning instruments, including Regional Plans and the Code. Section 58(4) of the PDI Act is explicit in stating that "a state planning policy is not to be taken into account for the purposes of any assessment or decision with respect to an application for a development authorisation under this Act." Accordingly, the published *State Planning Policies for South Australia* (23 May 2019) state on page 13 that "SPPs are not used for development assessment", although they are considered in the preparation of an environmental impact statement for an impact assessed development.

Therefore, in my view an assessment against SPP5 is not relevant to the application, notwithstanding the practice of the Department of Housing and Urban Development (DHUD) to reference alignment to the SPPs in its assessment reports for consideration by SCAP.

Nonetheless, the Code incorporates policies that align to SPP5 to address climate change considerations. In particular, the Gillman Subzone notes the requirement to fill land to a level of 3.7 metres (m) Australian Height Datum (AHD) to protect development from future sea level rise, and for the provision of land for stormwater management and flood mitigation. Relevant climate change policies are also included in the Coastal Areas Overlay, and the Design and Design in Urban Areas General Development Policies (GDPs).

The Planning Report submitted with the application provided a comprehensive assessment of the proposed development against the relevant policies of the Code and demonstrated its consistency. In our opinion, the proposed development is consistent with the policies of the Coastal Areas Overlay, Gillman Subzone, Strategic Employment Zone and various GDPs that speak to climate change matters.

The Gillman Master Plan prepared by Renewal SA, and subsequent rezoning of the land through a Development Plan Amendment (DPA), included sufficient studies to demonstrate that development of the land was appropriate. However, this does not mean that no care needs to be taken in the subsequent design of development in accordance with the policies of the Code. Accordingly, the Department has undertaken significant work over the past three years to consider and address environmental issues and the appropriateness of filling the land.

As a result, notwithstanding the longer-term intent of Renewal SA, the development proposed by the Department does not fill all of the subject land. It avoids the areas with highest environmental value and retains more than sufficient capacity for stormwater management consistent with the relevant provisions of the Gillman Subzone.

Furthermore, as noted for the previous application, strategic decisions have been made by multiple past State Governments that the land at Gillman and Dry Creek be developed, and in doing so that areas to the north of the subject land within the Magazine and Range Basins be preserved for the environment. This has most recently occurred through the designation of the subject land and wider locality as a State Significant Industrial Employment Precinct in the Greater Adelaide Regional Plan (GARP) released in March 2025 (see **Figure 1**).

In my view it would be contrary to the outcomes of the Planning and Development Review (2008) and Expert Panel for Planning Reform (2013), which led to the current planning legislation and system design, to seek to revisit past strategic decisions through a development application. The planning system is intended to resolve strategic questions upfront and not have them repeatedly revisited for subsequent development applications, which FoPR and PAREPG in particular, and in some respects Council, are seeking. To do so would be at odds with the principles encapsulated in *State Planning Policy 1: Integrated Planning*.

Figure 1: State Significant Industrial Employment Precinct at Gillman (GARP)



In respect to the blue carbon potential of the land, which is noted in GARP and refers to the carbon stored in coastal and marine ecosystems like mangroves, seagrass beds, and salt marshes, I reinforce the past strategic decisions of State Government to develop the land. This includes the decision to realise the economic benefit from the T2D spoil by locating the SRF at Gillman.

I also highlight that only 0.76% of the threatened ecological community (TEC) of saltmarsh in the immediate locality is impacted by the proposed filling. The development proposed by the Department retains a significant area of saltmarsh habitat on the subject land, and there remains significant opportunity from the remainder of the Range Basin, the Magazine Basin, the Barker Inlet and along the length of the Adelaide International Bird Sanctuary National Park Winaiyinaityi Pangkara to contribute to blue carbon.

4 Coastal Flooding, Sea Level Rise and Coastal Protection Infrastructure

The Board notes that for compliance with its coastal flooding risk standard, minimum building site and floor levels of 3.7m and 3.9m AHD respectively are required in the Gillman Subzone. The proposed development will achieve this through the filling of land to 3.7-4.2m AHD.

The Board notes that a site level of 3.7m AHD is to allow for a 1% Annual Exceedance Probability (AEP) sea flood level (tide, stormwater and associated wave effects combined) and 0.3m of sea level rise to the year 2050. However, it has indicated that development should account for a further 0.7m of sea level rise to the year 2100 to align with the *Coast Protection Board Policy* (October 2022), and that consideration should be given to raising the fill mounds to 4.4m AHD. This commentary from the Board has echoes of those provided to Renewal SA in relation to the Gillman Master Plan and the associated DPA. At the time, the Board indicated that consideration should be given to ensuring that the <u>sea wall and levees</u> could be raised to 4.4m AHD to address coastal flooding risk associated with future sea level rise.

It is not proposed to change the application to achieve a consistent site level of 4.4m AHD, nor make changes to existing coastal protection infrastructure. However, the filling of the land as currently proposed does not preclude further filling of land by Renewal SA to raise site levels as part of future development if it is deemed necessary, or the Board's policy is translated to the Code through a future Code Amendment. A key consideration in determining if this may be required will also include decisions on the future of the sea wall and levee heights, and future upgrades to the tidal gates.

The Board has noted that Renewal SA, as owner of the land, has responsibility to assess the condition and suitability of the sea wall and levee, to ensure it addresses potential risk. Council has requested confirmation of who, how and when the identified potential upgrades to the tidal gates would be funded and completed, including when further investigation would be complete to confirm upgrade requirements. The FoPR submission highlights that there is no guarantee by State Government to upgrade the tidal gates.

The Department, as applicant, and Renewal SA, as landowner, both acknowledge that there will be a future need for repair, replacement or augmentation of the tidal gates. The requirement for such an upgrade will be a consequence of a combination of factors, such as:

- filling rate of current low-lying areas within the locality earmarked for development, including the subject land and other land to the east, north and along Grand Trunkway;
- the nature and form of future development (i.e. land use, extent of built form and hardstands, and on-site landscaping and stormwater infrastructure) within the broader Gillman Precinct, which is yet to be confirmed; and
- increases to sea levels, which will occur over time.

As outlined in the Planning Report and flooding assessment submitted with the application, the filling of the subject land as currently proposed by itself does not trigger the need for any upgrades to the tidal gates; therefore, no upgrades are proposed as part of this proposed development. The future upgrade of the tidal gates is separate from and independent to the requirements of this application and is the future responsibility of Renewal SA as the landowner and ultimate developer of land.

Considering the opportunity provided by the T2D Project for beneficial reuse of spoil to fill the land, Renewal SA has advised it is currently reviewing its future plans for the development of Gillman. This will include consideration of the enabling infrastructure required to support future employment uses, mitigate flooding and manage stormwater.

The Board has also noted that a number of temporary buildings and site infrastructure will be constructed at a site level that is below the required 3.7m AHD, and that these components may potentially be vulnerable to flooding events. The information submitted with the application indicated there would be minimal filling of land where site infrastructure is to be located. However, the T2D Alliance will create a general site level and bridging layer that is raised above the existing ground level to 2m AHD, with fill between 0.5m and 1.5m in depth depending on existing site levels. This level will be above the 10% AEP and is appropriate considering the temporary nature and type of facilities for the SRF.

Any future permanent development in these areas (by Renewal SA or other parties) will need to consider higher site levels should they not be subsequently filled in Stage 4 of the proposed development covered by this application.

5 Wetlands and Stormwater Flooding

The submission from FoPR casts doubt on the flood modelling undertaken to support the application, while PAREPG is of the opinion that filling the site considerably reduces the capacity to deal with increased stormwater flooding. Council is concerned that the application does not appear to have considered assumptions of future urban growth leading to increased impermeable surfaces and requirements for space for future wetland expansion.

Wetland Expansion

Council has suggested that the lack of consideration of wetland expansion may be at odds with Subzone Desired Outcome 2 and Performance Outcome 2.1 in respect of: 'the provision of land for stormwater management and enhancement of tidal flow and habitat function of Magazine Creek, Range Wetlands, samphire and mangroves." However, I observe that Concept Plan 102, which directly relates to the future development of the Gillman Subzone, does not make provision for wetland expansion on the subject land nor earmark the land as an area for stormwater management.

I also note that expansion of the Magazine Creek and Range Wetlands is not specifically listed as a required action within Council's current Stormwater Asset Management Plan 2024 (SAMP) or draft Long-Term Financial Plan 2025-34, or the 2015 Torrens Road Catchment Stormwater Management Plan (TR SMP).

It is acknowledged the SAMP allocates funding for projects that <u>may</u> consider their expansion in the future, including:

- an update to the TR SMP in financial year 2026/27;
- a general wetlands performance investigation in 2027/28; and
- general drainage construction from an updated TR SMP from 2027/28.

However, decisions in respect of this application cannot have regard to possible projects that have not been subject to investigation, review, consultation and approval, nor incorporated into strategic plans and the Code.

Wetland Access

Similar to the previous application, Council has requested a 6m buffer to their wetlands to provide for essential maintenance activities. The proposed filling activities for the SRF do not encroach on the Magazine Creek or Range Wetlands or existing access tracks within their boundaries, and existing access points identified in **Figure 2** and **Figure 3** are not impeded. Therefore, a buffer is not considered required.

Figure 2: Range Wetlands access points



Figure 3: Magazine Creek Wetlands access points



The Department recognises the importance of stormwater and flood storage capacity due to the Range Basin, together with the Magazine Basin, providing flood storage capacity in a 1% Annual Exceedance Probability (AEP) storm event with elevated tidal levels. As such, the Department undertook additional flood modelling to confirm the appropriateness of filling the subject land. This in part led to the separation of the applications for the SRF into two parts to allow for that modelling to occur.

The flood analysis undertaken by Mott MacDonald incorporated inputs from recent coastal flood modelling provided by the Board and past flood modelling undertaken by Tonkin Consulting. Tonkin Consulting also peer reviewed the analysis, noting their knowledge of the site and experience undertaking flood modelling for the AdaptWest Climate Adaptation Plan (2018), the TR SMP (2015) and the Gillman Master Plan (2014), amongst other relevant studies in the region.

Flood modelling undertaken by Tonkin Consulting in 2018 for the AdaptWest Climate Change Adaptation Plan¹, which was developed collaboratively by the Cities of Charles Sturt, Port Adelaide Enfield and West Torrens, indicates that peak flood levels in the Magazine Creek Wetland governs flooding in the upstream catchment. That modelling showed the peak flood level reached in the wetland is relatively unaffected by sea level rises up to 0.5m, with most of the impact of these rises in sea level being taken up by increasing flood levels in the Magazine Creek Wetland flood levels is more significant. Flood levels in the Range Wetland and further upstream were modelled to be relatively unaffected by sea level rise, primarily due to their higher level and the fact that they are currently isolated from Magazine Creek by a seawall and blocked outlet pipe.

In its assessment, Tonkin Consulting recommended that the maximum fill extent of land at Gillman not exceed that illustrated in light blue in Error! Not a valid bookmark self-reference., which is consistent with the area considered by the Gillman Master Plan. The extent of filling proposed by the current application, together with that approved for the previous application, is identified in contrast to this recommendation.

Mott MacDonald's flood modelling to support the SRF is consistent with modelling results undertaken previously by Tonkin Consulting, both of which consider impacts of stormwater from future development

Western Adelaide Region Climate Change Adaptation Plan, Coastal and Inundation Modelling Phase 3 Report, February 2018, Tonkin Consulting
State Commission Assessment Panel | 2 June 2025

upstream. Filling the whole of the subject land, which is beyond the scope of this application, together with other land identified for development at Gillman and Dry Creek within the Gillman Subzone, will result in minor flood impacts upstream of the tidal gates due to displaced storage in the Range Basin. However, the impacts are considered modest with 25 to 110 millimetre (mm) increases above existing conditions during Mean High Water Springs (MHWS), with future sea level rise from climate change and <u>no change</u> to the existing tidal gates.



Figure 4: Limit of Development within Gillman recommended by Tonkin²

The flood modelling undertaken generally shows that areas outside of the Magazine and Range Basins that were modelled to stay dry in a worst-case flood event where there is no filling of the subject land stay dry in an ultimate filling scenario (as proposed by the Gillman Master Plan). The areas that become wet are denoted in blue in **Figure 5** and are entirely contained within the drainage basins highlighting the appropriateness of filling even beyond the scope of this application. Impacts from filling the subject land as currently proposed will be significantly less than illustrated and be contained almost entirely on the subject land.

Therefore, having regard to the various assessments undertaken, the filling proposed by this application is considered appropriate having regard to potential flooding impacts.

² Source: Figure 6.2 (Page 55), Western Adelaide Region Climate Change Adaptation Plan, Coastal and Inundation Modelling Phase 3 Report, February 2018, Tonkin Consulting State Commission Assessment Panel | 2 June 2025 Page 8 of 19



Figure 5: 1% AEP depth with MHWS+CC tailwater, ultimate fill scenario under current tidal gate conditions afflux

6 Stormwater and Pollution into the Barker Inlet

The FoPR submission notes concern about increased stormwater discharge into the Magazine Creek and Range Wetlands, as well as potential contamination of the Barker Inlet, due to higher intensity rainfall due to climate change combined with an increasingly impervious catchment. In the first instance, there is no discharge of stormwater from the subject land to either wetland, being downstream of both. Any discharge is proposed onto the subject land, with a combination of evaporation, infiltration and outflow from the existing pipes (if unblocked by future maintenance or upgrades) under the seawall into the Magazine Basin expected depending on volume.

The T2D Alliance is currently finalising designs and a Stormwater Management Plan for the Gillman SRF, incorporating the proposed development and the approved development on Lot 501. The stormwater detention infrastructure significantly exceeds the minimum requirement of being capable of accommodating a 20% AEP rainfall event, as prescribed by the EPA *Stormwater Pollution Prevention Code of Practice for Local, State and Federal Government* (1998).

Acknowledging the SRF will be operational for a short period, the T2D Alliance is targeting an economical balance of increasing stormwater retention and reducing reliance on potable water reuse, while minimising redundant capital spend.

The fill formations and spoil drying pans will be graded to induce stormwater runoff to catch drains with sediment controls, such as rock checks, coir logs and sediment fences implemented downstream. The catch drains will be constructed within the bridging layer, as presented in Figure 6, and will intercept run off from the pad formation. Surface water flows will be directed to detention basins, enabling fine soil particles suspended in the water to settle, and leaving the water available for reuse.

Figure 6: SRF Formation Drainage Elements



The SRF's proposed stormwater infrastructure includes pumps within each detention basin, which enable the progressive transfer of water from basin to basin, prior to being stored for treatment by the proposed water treatment plant (WTP). The WTP will incorporate fine gravel/sand filters and automatic pH-balance devices to treat the water. Treated water will be stored in an adjacent 'clean water' basin, before being pumped to storage tanks adjacent the truck washing area.

In the scenario of a forecast storm event, any loose spoil material, either on the drying pans or in the process of being placed, will be stockpiled and sealed off as best as possible to minimise the likelihood of increasing the sediment load within the waters directed to the swales and eventually, basins. While it is unlikely the capacity of the basins will be reached, they will be designed and constructed to include an overtop provision, to protect the implemented SRF infrastructure, with overflows directed towards the existing low-lying areas of the subject land contained behind the levee.

Surface water will be managed onsite through a number of different strategies to ensure all reasonable and practicable measures are taken to manage run-off from the site. These strategies include:

- controlling drainage from outside the site so that it is diverted around all disturbed areas and allowed to naturally infiltrate the soils and/or flow into the Magazine Basin;
- using simple, temporary measures, where appropriate, to treat runoff from small areas that may be exposed for a short period of time (i.e. sediment fencing, coir logs, check dams, silt socks, etc.);
- controlling drainage on the site by intercepting and redirecting runoff to catch drains and basins for treatment and reuse; and
- installing erosion and sediment control structures in the early stages of site disturbance.

Surface water treatment options (when required) include:

- discharge to vegetated areas with sufficient area to remove suspended solids;
- flocculation of the water to remove sediment if turbidity is above 10 Nephelometric Turbidity Units (NTU);
- flocculation of the water to remove sediment from the water so that it is less than the NTU of the receiving water;

State Commission Assessment Panel | 2 June 2025 Page 10 of 19

- addition of acid or alkaline substance for pH management; and
- installation of energy dissipators where dewatering of basins will occur to minimise erosion and sediment mobilisation.

It is noted that the WTP and discharge of treated water to inland and marine waters will require a licence from the EPA under the *Environment Protection Act 1993* (EP Act) and subject to further assessment and potential licence conditions. The EPA has reviewed the application and is satisfied that the proposal, including the operation of the WTP, can be designed and operated in a manner that would not result in unacceptable water quality impacts. The EPA acknowledged that proposed outfall of excess treated water downstream of the Magazine Creek and Range Wetlands, resulting in no water quality impact from discharge upon the marine environment of the Barker Inlet, is acceptable to the EPA with appropriate conditions.

7 Saltmarsh Threatened Ecological Community

All three public submissions note concerns with impacts to saltmarsh (i.e. samphire). Both Council and the Board suggested that the area to be filled be revised to exclude the 1.11 ha portion of land within the TEC, with Council suggesting more detailed mapping be completed of the TEC to show the location of sensitive plant species that require protection.

As noted in the Planning Report, following field survey by ecologists from Umwelt in December 2023, the subject land and a wider study area was identified as including samphire TEC, which was mapped and included in their assessment. However, most of the area of TEC in the locality extends beyond the subject land and is concentrated in the Range and Magazine Basins to the north. The TEC is potential habitat for *Calidris acuminata* (Sharp-tailed Sandpipers), which is a vulnerable and migratory bird species protected by the EPBC Act. However, the TEC itself is not protected by the EPBC Act and the subject land is not in an area that is subject to the NV Act.

The proposed filling will generally avoid the areas of sensitive environmental habitat on the subject land, which was identified in the plans submitted with the development application and is consistent with the recommendation of PARPEG.

The Planning Report acknowledged there will be a small impact to an area of TEC within a former tidal watercourse to the northern end of the subject land. This land was subject to further assessment by Umwelt in the Addendum to the EPBC Act Self-Assessment completed in January-February 2025. The assessment and associated field surveys observed no obvious tidal water influence in this area. Umwelt concluded that the 1.11 ha TEC mapped as impacted by filling, which is just 0.76% of the TEC assessed within the study area, was of a degraded quality and may not meet all the TEC diagnostic criteria (including tidal influence).

The Department is satisfied that measures taken to reduce impacts to sensitive saltmarsh environment and habitat in the proposed development demonstrate a reasonable minimisation and avoidance of impact in accordance with its ETHM. I am confident in the outcomes of the Umwelt assessments and am of the view that exclusion of impacted TEC from the proposal would not result in a material environmental benefit.

The Board is also concerned with changes to hydrology patterns impacting the TEC on the subject land and within the Range Basin upstream. However, the current hydrological patterns (see Error! Reference source not found.) will not be fundamentally disturbed by the filling of the land. Areas that are inundated now will continue to be inundated in the future and generally to the same degree and duration. The current hydrological pattern has likely supported the TEC on the subject land, with stormwater mixing with saline groundwater to support the saltmarsh isolated from tidal interaction by the levee.

Figure 7: Locality hydrology



The proposed filling of the subject land and creation of catch drains at the perimeter of the fill mounds will only alter stormwater flows from rain falling on the subject land. As outlined above, this water will be captured and treated for reuse on-site, with any discharge of treated water to occur to the low-lying areas of the subject land in accordance with an EPA licence.

8 EPBC Act Self-Assessment and Impacts to Migratory Birds

Council, FoPR and PAREPG have all noted concerns with the timing and seasonal suitability of the additional targeted bird surveys completed by Umwelt in January and February 2025. It has been noted that the targeted bird surveys were undertaken in one of Adelaide's driest summers with concern expressed that this may have significantly diminished the suitable foraging and roosting habitat available for the target species.

Council has further noted that in their view both the Range and Magazine Wetlands, and the temperate coastal saltmarsh habitat that surrounds them, are important in the mosaic of sites that make up the upper Gulf St Vincent East Asian-Australasian Flyway site. They assert that stronger consideration should be given to mitigating or minimising the loss of a site within the flyway network, to which these birds are heavily reliant.

The submissions from FoPR and PAREPG, and the comments from Council, also assert that the activities of filling the land will cause undue disturbance to migratory shorebirds from light, noise and dust, and trigger indirect impacts that should be assessed under the EPBC Act.

Consequently, they call into question the validity of the EPBC Act Self-Assessment undertaken by Umwelt. That assessment concluded there would not be a significant impact to protected species under the EPBC Act and a referral to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) was not required.

Responses to the various issues related to the impacts on migratory birds and referral under the EPBC Act are outlined below.

Direct impacts to migratory bird habitat

The original Self-Assessment from March 2024 was based on a smaller footprint on the subject land. Following appointment of the T2D Alliance by the State Government, it was determined that a larger area to accommodate spoil may be required, which would necessitate impact on the small area of TEC discussed above. Therefore, the Department requested Umwelt assess whether impacting this additional area would constitute a significant impact to migratory birds, including Sharp-tailed Sandpipers, and change its prior assessment. Importantly, this was separate and in addition to extra bird surveys commissioned by the Department to further consider the areas of saltmarsh on the subject land that would be retained.

It is acknowledged that 2024 was drier than average in Adelaide, and that rainfall totals in the 2025 summer were also below average, potentially impacting on bird numbers. However, the original field surveys undertaken by Umwelt to inform the EHIAR and their original Self-Assessment occurred in December 2023. According to the Bureau of Meteorology, rainfall totals for 2023 were close to average or above average at sites across Adelaide, with December much wetter than average and thunderstorms in late November breaking rainfall records in parts of Adelaide. The conditions on-site during the original surveys in late 2023 would have been in stark contrast to the additional surveys earlier this year.

In its Addendum to the original EPBC Act Self-Assessment, Umwelt concluded there would not be a significant impact and a referral to DCCEEW was still not required. Additional bird surveys did not fundamentally influence the assessment, being based on the extent and condition of the impacted area of TEC.

In the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines*, there is likely to be a significant impact on a migratory species if there is a real chance or possibility that an action will:

- <u>substantially modify</u> (including by fragmenting, altering fire regimes, altering nutrient cycles or altering hydrological cycles), destroy or isolate an area of <u>important habitat</u> for a migratory species
- result in an invasive species that is harmful to the migratory species becoming established in an area of important habitat for the migratory species
- seriously disrupt the lifecycle (breeding, feeding, migration or resting behaviour) of an <u>ecologically</u> significant proportion of the population of a migratory species (our underline).

Crucially, the Guidelines reference important habitat, which is defined as:

- habitat utilised by a migratory species occasionally or periodically within a region that supports an <u>ecologically significant proportion of the population</u> of the species; and/or
- habitat that is of critical importance to the species at particular life-cycle stages, and/or
- habitat utilised by a migratory species which is at the limit of the species range, and/or
- habitat within an area where the species is declining (my underline).

The Guidelines provide significant impact criteria for vulnerable species, which were assessed in the EPBC Act Self-Assessment for multiple species, including migratory birds. As outlined in *EPBC Act Policy* Statement 3.21 Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species, significant impact judgements are made on a case-by-case basis and with consideration for the context of the action taking place. The potential for a significant impact on migratory shorebird species depends on the:

- timing, intensity, duration, magnitude and geographic extent of the impact
- sensitivity, value and <u>quality of the environment</u> within and around the area
- combined effects of impacts within and outside the area, direct and indirect impacts, as well as cumulative impacts already sustained
- presence of this and other matters of national environmental significance (my underline).

Having reviewed the guidelines and Umwelt's report, I consider that the proposed filling of land, including a very small portion of the TEC, is not substantially modifying an important habitat due to the limited geographic extent and the poor quality of the TEC proposed to be directly impacted.

I also consider it relevant that none of the study area is included within the Adelaide International Bird Sanctuary National Park Winaiyinaityi Pangkara, nor have previous reviews of the subject land for the Gillman Master Plan concluded that there was a significant impact to migratory birds.

Indirect impacts from SRF operations

In terms of impacts to habitat and migratory birds from the operations of the SRF, the proposed development includes measures to capture and treat stormwater runoff from site, there will be landscaping of the fill mound batters to reduce erosion and dust, and the Construction Environmental Management Plan (CEMP) prepared by the T2D Alliance for the SRF will address operational environmental impacts, including noise and dust through specific sub-plans (as recommended by the EPA). A Soil, Erosion and Drainage Management Sub-Plan (SEDMP) also supports the CEMP and specifically addresses potential impacts to water quality, sediment, stormwater management and groundwater.

The Department acknowledges that any significant changes in artificial light could adversely affect nocturnal fauna that frequent areas in proximity to the SRF site if not appropriately managed. Changes to night sky conditions can occur due to general luminous glow, i.e. skyglow, that is caused by the scattering of light in the atmosphere. The skyglow is a term used to describe the brightness of the night sky in a built-up area because of light pollution from artificial light sources.

Any potential additional contribution to skyglow from the SRF is located on the southmost extents of Lot 501 and 502 where site facilities and potential permanent lighting will be located. At this location there is the greatest separation distance to sensitive aquatic and terrestrial environments, and it is immediately adjacent to the existing artificial lighting extent of urban Adelaide, including the Port River Expressway and existing industrial land uses. Therefore, a negligible light source contribution is anticipated. As a result, the potential for any change to skyglow, and the potential impact to nocturnal (night-time) species is considered negligible.

The Department also acknowledges that there is the potential for light spill on adjacent lands and sensitive receivers from proposed temporary lighting, and vehicle/equipment lighting during the proposal life if not appropriately managed. Direct light spill will be a consideration in lighting placement, with measures implemented by the T2D Alliance to manage the risks associated with direct light spill.

Small temporary light towers similar to those in use by ResourceCo on adjoining Lot 202 (Figure 8) are anticipated, which will be directed internally and away from the areas of saltmarsh and the adjoining wetlands.



Figure 8: Temporary lighting tower on adjoining Lot 202 (ResourceCo site)

However, the principal determinant under the EPBC Act is whether there is such a significant impact as to "seriously disrupt the lifecycle (breeding, feeding, migration or resting behaviour) of an ecologically significant proportion of the population of a migratory species", per EPBC Act Policy Statement 1.1. This requires there to be 0.1% of the flyway population of a single species of migratory shorebird regularly supported, or 2000 migratory shorebirds or 15 migratory shorebird species. While Umwelt indicated in its Self-Assessment it is

possible, the original field surveys in December 2023 and subsequent surveys in January and February 2025 would suggest that this threshold is not met.

Council has requested the proposal include mitigation measures for light pollution impacts on shorebird habitat in line with the National Light Pollution Guidelines and incorporate best practise light design principles per a Light Management Plan. This is not considered necessary to be conditioned having regard to the environmental values of the site and locality and limited impacts expected to migratory birds.

Validity of the EPBC Act Self-Assessment

Umwelt are highly regarded ecologists with significant experience in surveying flora and fauna and undertaking assessments against the EPBC Act. Their assessment was based on field surveys in multiple seasons of differing rainfall profiles and informed by desktop research, including the Biological Database of South Australia.

In considering the direct impacts on the TEC and the indirect impacts of the operations of the SRF, Umwelt was of the view that there would not be a significant impact on protected birds arising from the proposed establishment of the SRF on the subject land. Therefore, they concluded a referral to DCCEEW under the EPBC Act is not required.

In my opinion, the assessment of Umwelt is entirely valid, well considered and consistent with the EPBC Act.

9 Site Contamination, Groundwater and Interim Audit Advice

The FoPR submission raised concern with the need to ensure that contaminants are not currently leaching, or will not leach, into the Barker Inlet because of the proposed development. The EPA Accredited Site Contamination Auditor (ASCA) is required to prepare audit criteria specifying the type and characterisation of waste derived fill (WDF) which will be deemed to be suitable to be accepted for use at the SRF. This will consider chemical criteria (including leachability) that will not cause harm to the environment or human health.

Modelling of groundwater is being undertaken for the SRF by Agon Environmental, with the migration potential of existing contaminants identified at the Gillman SRF assessed (as outlined in the submitted Detailed Site Investigation). The predicted particle movement is illustrated in Error! Reference source not found. and shows (as indicated by the three coloured groups) that any contaminants released into groundwater onsite (e.g. leachable chemicals within stockpiled soil, etc.) may in the future be captured by subsurface groundwater drains of the Magazine Creek Wetlands, but this is not likely to occur within the next 100 years.

The model predicted seasonal mounding of groundwater within the filled areas. To further assess the potential mobilisation of contaminants the SRF design components such as surface water drainage and bridging layer configuration will be built into the groundwater model. This will allow assessment of the potential mobility of leachate from the fill formations and feed into the audit criteria required to be prepared by the ASCA as part of Interim Audit Advice (IAA).

As noted in the Planning Report and cited in the response from FoPR, this application seeks a staged approval that aligns to the construction stages for the T2D Project. The sources of fill are governed by the separate Auditor Protocol under the EPA *Standard for the production and reuse of waste derived fill* (WDF Standard), which includes provision of IAA from the ASCA. The IAA is not required for the first stage of site establishment and is only relevant to the importation of WDF from the T2D Project.

This staged approach has been endorsed by the ASCA, and was accepted by the EPA and approved with conditions by the Minister for Planning for the previous application for Lot 501. The EPA has also confirmed in its comments on this application that the proposed management of contamination and site audit process in accordance with the requirements of the WDF Standard is acceptable subject to the implementation of recommended conditions consistent with those imposed for the previous application. The Department accepts the recommended conditions from the EPA in relation to these matters.

Figure 9: Contamination Migration Assessment



10 Visual impact of the proposed development

Concern has been raised by Mr Crook regarding the potential negative visual impact of the proposed development. This is similar to concerns of SCAP in relation to the Part 1 application and influenced the condition of approval requiring a landscaping plan, particularly along the Port River Bikeway and adjacent the Magazine Creek Wetlands. The Department has recently engaged a landscape architect to prepare the landscaping plan to meet the condition on the Part 1 approval, and to support this application and the separate upgrade of Hanson Road.

It is acknowledged that the application proposes to fill land up to 8m AHD prior to finalising a finished site level of 3.7-4.2m AHD. That final finished site level is consistent with the expectations of the Gillman Subzone and recent development occurring in the locality. The temporary higher height is considered appropriate in the interim to help form a platform for future development through compaction, particularly in light of existing filling operations occurring in the locality that is higher than the anticipated height at the SRF (see **Figure 10**).



Figure 10: Filling of adjoining Lot 202 (ResourceCo)

The visual impact from the proposed development is considered acceptable in the context of the ultimate development outcome envisioned for the land, the existing locality context, existing and proposed future land uses, existing visual amenity, and distance from 'sensitive' uses with the nearest residents one kilometre south in the suburbs of Ottoway and Rosewater. Proposed landscaping will mitigate impacts on users of the Port River Bikeway.

11 Proposed Conditions of Approval

Numerous conditions have been recommended by the EPA, Board, DEM, Commissioner of Highways, Council and PAREPG. In the main, these recommended conditions align to those imposed on the previous application and are acceptable. However, there are several recommended conditions that I suggest should be edited and, in some instances, omitted from any approval recommendation from SCAP to the Minister.

Environmental Management

The EPA has recommended several conditions for the proposed development and operations of the SRF. These relate to the management of environmental impacts from operations, stormwater management, alignment with the process for waste derived fill under the WDF Standard, remediation of contaminated materials, and the operations of the WTP. The recommended conditions are largely consistent with those imposed on the previous application, but have been refined to reflect the additional information provided to the EPA through this application, the resolution of conditions for the previous approved application, and the audit process under the WDF Standard.

The Department accepts the EPA's position and recommended conditions, but I would suggest a minor change to their proposed condition 3:

"A construction environment management plan **prepared by a suitably qualified and experienced site contamination consultant** as per the guidance contained in Environment Protection Authority Guideline Construction Environmental Management Plan (CEMP)..."

I believe that any condition outlining the development of a CEMP should require that it be prepared by a suitably qualified and experienced environmental professional; only elements pertaining to site contamination issues should require preparation by a suitably qualified and experience site contamination consultant. This is requested to ensure consistency with the requirements of the EPA Guideline CEMP, and to ensure appropriately qualified and experienced subject matter experts prepare elements not related to site contamination issues.

Coastal Environment and Saltmarsh Protection

The Board has recommended four conditions, of which two are problematic.

I would argue that the first condition should not be considered as it refers to the EHIAR, which did not form part of the application, and suggests that the filling of the land align to a footprint considered in an earlier draft of the EHIAR provided to the Board for the previous application. That footprint excluded the 1.11ha of TEC proposed to be impacted by the application. I believe it has been adequately demonstrated in the Planning Report, EPBC Act Self-Assessment and above that impacting the small area of TEC is acceptable.

I would also suggest the Board's recommended third condition be amended to align with Condition 16 of the approved development on Lot 501, which removes references to jute matting. Appropriate alternatives can be considered and incorporated through the preparation of the landscaping plan, on which the Board will be consulted.

Council has recommended that a condition requiring a landscaping plan be applied consistent with the previous application, but that the wording be modified to reflect the close proximity of the Magazine Creek Tidal Creek Outflow. As illustrated in **Figure 7Error! Reference source not found.**, this outflow is more than 500m distant from the areas to be filled and landscaped on the subject land. The proposed development also preserves an approximate 200m wide buffer of TEC between the fill mound and the levee dividing the subject land from the Magazine Basin. Therefore, the wording suggested by Council may be irrelevant, but referencing the interface to the TEC itself may better reflect their intent.

Protection of Migratory Birds

PAREPG has recommended that there be a condition requiring provision of shielding of adjacent bird communities from noise, dust and light spill. As discussed above, there is not expected to be a significant impact on birdlife that would require a condition beyond ones similar to those imposed on the previous application for preparation of a CEMP and in relation to external lighting.

Stormwater Management

The EPA, Council and Board have all recommended conditions relating to stormwater management. I would suggest that the wording of the EPA's recommended condition for a Stormwater Management Plan be adopted with additional requirement to consult with the Council and Board.

SEA Gas pipeline

DEM has requested a number of conditions be imposed on any approval granted by the Minister to ensure the protection of the SEA Gas pipeline located over the southern corner of the land, within the road reserve that separates the subject land from the adjacent Lot 501, and along the Port River Bikeway. However, these conditions differ from those recommended for the Part 1 development application and imposed on its approval by the Minister.

The T2D Alliance has liaised with SEA Gas directly as part of its design process for the establishment of the SRF and sought advice on the conditions recommended by DEM. SEA Gas has agreed to modifications to the proposed conditions to align to the previous application (see **Attachment 1**). It is requested that the Minister adopt these in any approval of this application.

12 Summary

The development of the site for a SRF is essential to support the T2D Project, while filling of the land is essential to the delivery of the strategic land use outcomes sought by State Government for more than 20 years. The development appropriately balances achievement of development potential and protection of the environment.

The direct impacts to the environment are considered acceptable in the context of the past strategic decisions for the future development of the land, the provisions of the Code, the unique circumstances of the subject land and locality, and the measures put in place to avoid, minimise and mitigate impacts through the design of the development. Potential indirect impacts can be appropriately managed through the CEMP and subplans, the IAA under the WDF Standard, and licences required from the EPA under the EP Act.

I trust that the above information adequately addresses the concerns raised in the submissions and referral agency comments and will allow for assessment of the application to be completed. The Department will continue to liaise with referral agencies in respect to issues raised and proposed omissions or edits of recommended conditions ahead of the SCAP hearing.

Please do not hesitate to contact me if you have any further questions. I look forward to appearing on behalf of the Department at the SCAP hearing.

Yours sincerely

Mike Davis Technical Director Urban Planning +61 8 7325 7396 +61 414 357 276 mike.davis@mottmac.com

Attachments:

1. Feedback from SEA Gas

cc:	Scott Cooper	Department for Infrastructure and Transport	Kym Gerner	Department for Environment and Water
	Jason Rollison	Renewal SA	Michael Malavazos	Department for Energy and Mining
	Melissa Crystal	Environment Protection Authority	Tim Hicks	City of Port Adelaide Enfield

Mike Davis

From:	Anthony Cobiac <					
Sent:	Wednesday, 30 April 2025 11:37 AM					
To:	Motaz Elfar-T2D; Troy Davey-T2D; Shilpa Sharma-T2D; Luke Backo; Alex Lloyd; Harry Pho; Tim Galaz-T2D; Alex Czerwinski; Michael Jarosz; San Yonjan-T2D; Johannes Smit					
Cc:	Sam Mosleh-T2D; Nathan Lewis-T2D					
Subject:	RE: SEAGAS Crossing - Gillman Follow-up meeting					
Attachments:	502 SEA Gas Conditions AC xlsx					
Follow Up Flag: Flag Status:	Follow up Flagged					

Hi Motaz,

•

Apologies for the delay.

• Conditions reviewed and added in a new column with my comments



• Cheers Ant

Anthony Cobiac Principal Pipeline Engineer

SEA Gas L5, 57 Wyatt Street Adelaide SA 5000 T 08 8236 6886 I M www.seagas.com.au



This email message is for the use of the intended recipient only and any attachments are confidential; they may contain legally privileged information or copyright material. If you are not the intended recipient, please advise the sender and delete the email. SEA Gas accepts no liability for any damage caused by this email or its attachments.

TORRENS TO DARLINGTON

ALLIANCE

Gillman Spoil Reuse Facility (SRF) Lot 501 and Lot 502 development conditions

No.	Lot 501 Condition Wording	No.	Lot 502 Condition Wording	T2D Alliance comments	SEA Gas Comments from the meeting on 14/04/2025	SEA Gas Comments 30/04/2025
1	No permanent above ground infrastructure (including poles, fencing or signage) shall be installed within 6 metres of the SEA Gas Port Campbell to Adelaide Pipeline.		2 No permanent above ground infrastructure (including poles, fencing or signage) shall be installed within 6 metres of the Pipeline.	No permanent infrastructure will be installed; all installations are temporary. These temporary structures may remain in place at the end of the work.		
1:	Vibrating equipment must not be used within 10 metres of the SEA Gas Port Campbel to Adelaide Pipeline unless vibration monitoring is installed to demonstrate that vibration remains below 50mm/s peak particle velocity at the surface above the Pipeline		4 Vibrating equipment must not be used within 10 metres of the Pipeline unless vibration monitoring is installed to demonstrate that vibration remains below 50mm/s peak particle velocity at the surface above the Pipeline.	Noted. The vibrating equipment will be used under 50mm/s. The Alliance will suggest to Planning and Land Use Services that the wording of this condition is altered to match that imposed on Lot		No issues with the wording to match lot 501.
1	All contractors working within the pipeline easement or within 6m of the pipeline where no easement exists of the Port Campbell to Adelaide High Pressure Gas Pipeline belal underka pipeline aureanees training precided with SEA Case	1	0 All contractors working within the pipeline easement or within 6m of the Port Campbell to Adelaide High Pressure Gas Pipeline shall undertake pipeline awareness training provided hw SFA Gas	501. The Alliance will suggest to Planning and Land Use Services that the wording of this condition is altered to match that imposed on Lot 501	Sea Gas will conduct this training on-site for the necessary personnel	No issues with the wording to match lot 501.
2	Work on the SEA Gas Port Campbell to Adelaide High Pressure Gas Pipeline easemen or within 6m of the pipeline easement when no easement exists shall only take place on the condition that a SEA Gas site representative is monitoring the work.				Sea Gas will conduct this training on-site for the necessary personnel	
2	Tiger teeth and single point penetration teeth shall not be used within 6m of the SEA Gas Port Campbell to Adelaide High Pressure Gas Pipeline. The maximum size of the excavator operating on the pipeline easement shall be 30 Tonnes or less.		3 Within 20 metres of the Pipeline, excavator size must not exceed 30 Tonnes and tiger teeth or single point penetration teeth must not be used.	The Alliance will suggest to Planning and Land Use Services that the wording of this condition is altered to match that imposed on Lot 501 (i.e 20m is replaced with 6m).	Sea Gas to confirm	Agree that change can be to match lot 501
2	2 The SEA Gas Port Campbell to Adelaide Gas Pipeline shall be located by SEA Gas or under SEA Gas site supervision prior to any work on the pipeline easement or within 6m of the pipeline when no easement exists.		5 The Port Campbell to Adelaide Gas Pipeline shall be located by SEA Gas or under SEA Gas site supervision prior to any work on the Port Campbell to Adelaide High Pressure Gas Pipeline easement or within 6m of the pipeline when no easement exists.	Noted		
2	3 Pipeline Marker Signs shall be installed at intervals required by AS 2885 warning of the location of the SEA Gas Port Campbell to Adelaide Gas Pipeline.		9 Pipeline Marker Signs shall be installed at intervals required by AS 2885 warning of the location of the Port Campbell to Adelaide High Pressure Gas Pipeline.	Noted		
2	4 Service crossings of the SEA Gas Port Campbell to Adelaide Gas Pipeline shall be minimised to a single location that coincides with the road crossing.			The proposed crossing bridge by the Alliance and designed by WGA, will fulfill these requirements.		
2	There shall be a minimum of 500mm vertical separation between any new services and the SEA Gas Port Campbell to Adelaide Gas Pipeline.			Noted. There will be no excavation activities affecting the existing ground level, as excavation is not allowed due to the risk of mobilising acid suphate soits and/or damaging Aboriginal heritage. Consequently, the current vertical cover will remain unchanged throughout the duration of the project.		
2	There shall be no fill placed on the development site unless engineering analysis can show that that the SEA Gas Per Campbel to Adelaide Gas Pipeline will continue to comply with the stress and strain requirements of AS2885, including the stress and strain requirements for live and static loads.	1	17 Fill or objects shall not be stored on the pipeline easement at any time. a. Three shall not on fill placed on the development site unless engineening analysis demonstrates that the pipeline will continue to comply with the stress and strain requirements of AS2885, including the stress and strain requirements for live and static loads. The engineering analysis will need to be reviewed and approved by the relevant authority. The development must then be undertaken in accordance with the plans and documents which have met the relevant authority's reasonable statisfaction.	The proposed crossing bridge is currently being designed by WGA. Once the design process is complete, the final design will be submitted to Sea Gas for review and approval.	Sea Gas is satisfied with the current proposal for the crossing. The final design will be submitted for review and approval by Sea Gas.	
			All buried service crossings over the Pipeline (including stormwater, sewerage, water and common service trenches) must: a be installed such that individual services are not crossing the pipeline, unless the full section of the pipeline has been protected by either concrete (massuing 200mm thick at 20 MPa compressive strength) or 12.5mm thick HDPE protection slabs. b. be designed and constructed to ensure that they do not adversely impact the Pipeline, including by: L crossing the Pipeline at right-angles, where practicable ii. installed above the Pipeline, where practicable iii. astinimum of 500mm vertical separation between the service and the Pipeline; Details of the method of design and construction of all service crossings (including HDPE protection slab or a concrete slabs) must be provided to the relevant authority prior to 1 construction.	The proposed crossing bridge by the Alliance and designed by WGA, will fulfil these requirements.	Sea Gas is satisfied with the current proposal for the crossing to replace the existing requirements.	
			Depth of cover must not be altered and must remain as a minimum of 1200mm under road surfaces.	There will be no excavation activities affecting the existing ground level, as excavation is not allowed use to the acid subhate effect. Consequently, the current vertical cover will remain unchanged throughout the duration of the project. The Alliance proposes remains the phrase "depth of cover must	Need to include in our letter confirmation that laying HDPE pipe and 2- 300mm of flit locK.suggest wording should be altered to remove 'depth of cover must not be altered'	Perhaps wording can be adjusted to Depth of cover must not be altered without SEA Gas approval and must remain
			6	not be altered," as increasing the cover is acceptable, but decreasing it is not.		
			The applicant shall provide a traffic management plan which includes details of any permanent or temporary consigned in the POT campibili to Adelaide High Pressure Gas Pipeline such as the link road between lots 501 and 502.	The interpretation of "Traffic Management Plan" is a "Safe Access Plan" which will be arranged by the Alliance to ensure safe access for Saa Gas. The loads on the crossing areas will be checked as part of the design process. The Alliance sureat charging the term "Traffic Management Plan"	Bridge crossing - bridge designed to hardle loads - how accessing bridge, requirements for sea gas to access, and ensuings acg as pal are safe (radii gates) - maximum weight per avel (usually 12.5 T per avel). The traffic management plan is safe access plan	Happy with the term change to safe access plan a,
			7	to "Safe Access Plan" and will communicate this to DEM and Planning and Land Use Services.		
			Any crossing points for heavy vehicles shall be constructed such that the pipeline will continue to comply with the requirements AS2885, including the stress and strain 8 requirements for live and static loads.	Noted	The Alliance to communicate this to WGA	