



Environment Protection Authority
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EPA Reference: PDI-1427

31 March 2026

Daniel Marotti
 State Planning Commission
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Dear Daniel Marotti

EPA Development Application Referral Response

Development Application Number	25035365
Applicant	JHN Investments Pty Ltd & The Trustee for Callop Le Family Trust
Location	55 Arumpo Street, Renmark West (CT 6160/537) 49 Arumpo Street, Renmark West (CT 5329/105)
Proposal	Two-into-48 land division including the construction of new roads and CWMS.

This application was referred to the Environment Protection Authority (EPA) by the State Planning Commission in accordance with section 122 of the *Planning, Development and Infrastructure Act 2016*, Schedule 9(3)(9AB) of the *Planning, Development and Infrastructure (General) Regulations 2017* and Part 9.1 of the *Planning and Design Code*.

The following response is provided in accordance with section 122(5)(b)(ii) of the *Planning, Development and Infrastructure Act*.

PROPOSAL

The application proposes land division for a sensitive use.

The Site Contamination Declaration Form submitted with the development application (prepared by Julian Howard of EHS Support and dated 7 October 2025) identifies site contamination exists or may exist (for the purposes of planning consent) as a result of the following activities on adjacent land:

- Class 1 - Asbestos Disposal.

The EPA has undertaken a review of the following site contamination information provided in support of the development application:

- *Preliminary Site Investigation (PSI) Arumpo Street, Renmark* dated 13 October 2025 prepared by EHS Support.

The following report was subsequently provided in response to a request for further information by the EPA and has also been reviewed:

- *Construction Environmental Management Plan Arumpo Street Residential Development, 55 Arumpo Street, Renmark West, SA, 5341* dated 30 January 2026 prepared by EHS Support (the CEMP).

SITE CONTAMINATION ASSESSMENT

The purpose of this referral is to ensure that an appropriate and proportionate assessment of site contamination occurs to ensure land is suitable, or can be made suitable, for the proposed use. Through the referral, the EPA provides direction to the relevant authority on whether they must consider the advice of either a site contamination consultant or a site contamination auditor regarding site suitability.

The EPA's [Site contamination referral decision-making framework](#) describes how the EPA makes decisions on referred development applications and outlines the preconditions which must exist for a site contamination audit ('audit').

The available and relevant information has been reviewed by the EPA taking into account relevant legislation and guidelines provided in the *National Environment Protection (Assessment of site contamination) Measure 1999* (the ASC NEPM) and the EPA publication [Guidelines for the assessment and remediation of site contamination \(2019\)](#). In preparing this advice, the EPA has also had regard to the requirements described in [Practice Direction 14 Site Contamination Assessment 2021](#) (Practice Direction 14).

The EPA notes the following in relation to the reviewed information:

- The CEMP outlines the appropriate reuse of impacted soil beneath future road alignments, including validation and surveying by a licensed professional to provide an accurate depth of bonded asbestos containing material impacted soils.
- The CEMP has generally been prepared in accordance with EPA Industry Guideline [Construction environmental management plan \(CEMP\)](#), updated April 2024.

CONCLUSION

Based on the available information, the EPA understands that:

- site contamination is considered to exist
- realistic human health exposure pathways are considered to exist based on the proposed land use
- remediation is or remains necessary to mitigate exposure risk based on the proposed land use.

The EPA considers that sufficient information has been provided which reasonably demonstrates the site can be made suitable for the proposed use, subject to a statement of site suitability, using the form required by Practice Direction 14 completed by an appropriate practitioner.

The EPA is reasonably satisfied that while site contamination has been determined to exist, realistic human exposure pathways have been identified and remediation is considered necessary; based on the information available and other key factors, it has been adequately demonstrated the preconditions for audit have not been met for the proposed land use.

DIRECTION

The relevant authority is directed to attach the following conditions to any approval:

1. Remediation works must be undertaken in accordance with the *Construction Environmental Management Plan Arumpo Street Residential Development, 55 Arumpo Street, Renmark West, SA, 5341*, prepared by EHS Support (dated 30 January 2026) and must be overseen by a suitably qualified and experienced site contamination consultant.
2. A statement of site suitability (in the form described by [Practice Direction 14: Site Contamination Assessment 2021](#)) must be issued certifying that the required remediation has been undertaken and the land is suitable for the proposed use, prior to the first of the following to occur:
 - a. The issue of a land division certificate under section 138 of the *Planning, Development and Infrastructure Act 2016*
 - b. The issue of a certificate of occupancy granted in relation to a building or buildings on the relevant site
 - c. The occupation of a building or buildings for the purpose authorised under the development approval.

For the purposes of the above condition and regulation 3(6) of the Planning, Development and Infrastructure (General) Regulations 2017, the statement of site suitability must be issued by a site contamination consultant.

The following note provides important information in relation to the development and is requested to be included in any approval:

- The applicant/owner/operator are reminded of its general environmental duty, as required by section 25 of the *Environment Protection Act 1993*, to take all reasonable and practicable measures to ensure that activities on the site and associated with the site (including during construction) do not pollute the environment in a way which causes or may cause environmental harm.
- The applicant should ensure that all environmental controls required to mitigate or avoid potential environmental harm and nuisance are implemented during the works. This includes the controls relating to dust and air quality management and the appropriate handling and management of impacted soils, with all activities undertaken in accordance with the CEMP.

If you have any questions about this response, please contact Tudor Taylor on (08) 8429 9652 or email tudor.taylor@sa.gov.au.

Yours faithfully

Hayley Riggs
Delegate

ENVIRONMENT PROTECTION AUTHORITY