

McMahon, Gabrielle (DHUD)

From: Gabrielle.McMahon@sa.gov.au
Subject: FW: Feedback submitted for Major Development

From: PlanSA - Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 7 April 2025 6:36 AM
To: DHUD:SPC Reps <spcreps@sa.gov.au>
Subject: Feedback submitted for Major Development

Form Information

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Submission Id 1489635
Submission Time 07 Apr 2025 6:36 am
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Development Details

Applicant:	Department for Infrastructure and Transport
Development Number:	25004790
Nature of Development:	A change of use to a spoil reuse facility, filling of land and construction of temporary buildings, facilities and infrastructure at North Arm Road, Dry Creek
Subject Land:	Lot 506 North Arm Road, Dry Creek (D121878, QP502, CT6239/959) A change of use to a spoil reuse facility, filling of land and construction of temporary buildings, facilities and infrastructure at North Arm Road, Dry Creek
Contact Officer:	Gabrielle McMahon

Phone Number:	(08) 7133 2374
Close Date:	16 Apr 2025

Contact Details

Name: Barry Crook
Contact number: 0417835571
Email: Barry.crook1@bigpond.com
Postal address: 4 Partridge Court Golden Grove
Affected property:

Submission Details

I am: an owner of local property
I am - Other:
My position is: I oppose the development
Do you have concerns regarding the proposed development?: Negative impact to the fauna and flora as well the awful visual impact
What could be done to address your concerns?: Do approve the development
Other general comments:
PresentInPerson: I do not wish to be heard in support of my representation
NominatedSpeaker:

Supporting Documents

FilesUp: No file uploaded
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REPRESENTATION ON APPLICATION

Planning, Development and Infrastructure Act 2016

Applicant:	Department for Infrastructure and Transport Development Number:
Development Number:	25004790
Nature of Development:	A change of use to a spoil reuse facility, filling of land and construction of temporary buildings, facilities and infrastructure at North Arm Road, Dry Creek
Zone/Sub-zone/Overlay:	Strategic Employment Zone, Conservation Zone and Gillman Subzone
Subject Land:	Subject Land: Lot 506 North Arm Road, Dry Creek (D121878, QP502, CT6239/959)
Contact Officer:	Gabrielle McMahon
Phone Number:	08 7133 2374
Close Date:	16 th April 2025

My name*: Friends of Port River	My phone number: 0413 578086
My postal address*: c/- 132 Mead St , Peterhead	My email: friends@portriver.au

** Indicates mandatory information*

My position is:	<input type="checkbox"/> I support the development
	<input type="checkbox"/> I support the development with some concerns (detail below)
	<input checked="" type="checkbox"/> I oppose the development

The specific reasons I believe that consent should be granted/refused are:

See attached submission from Friends of Port River



Government of South Australia

Department for Trade
and Investment

[attach additional pages as needed]

Note: In order for this submission to be valid, it must:

- be in writing; and
- include the name and address of the person (or persons) who are making the representation; and
- set out the particular reasons why consent should be granted or refused; and
- comment only on the performance-based elements (or aspects) of the proposal, which does not include the:
 - [Click here to enter text.](#) *[list any accepted or deemed-to-satisfy elements of the development]*.

I:	<input checked="" type="checkbox"/> wish to be heard in support of my submission*
	<input type="checkbox"/> do not wish to be heard in support of my submission
By:	<input checked="" type="checkbox"/> appearing personally
	<input type="checkbox"/> being represented by the following person: Click here to enter text.

**You may be contacted if you indicate that you wish to be heard by the relevant authority in support of your submission*



Signature:

Date: 16 April 2025

Return Address: [Click here to enter text.](#) *[relevant authority postal address]* or

Email: [Click here to enter text.](#) *[relevant authority email address]* or

Complete online submission: plan.sa.gov.au/have_your_say/notified_developments

PLANNING, DEVELOPMENT AND INFRASTRUCTURE ACT 2016

S131 – CROWN DEVELOPMENT

Development Application No: 25004790 for Proposed Gillman Spoil Reuse Facility - Part 2

SUBMISSION: FRIENDS OF PORT RIVER

ISSUES OF CONCERN

Public Notification

Mott McDonald (pp66) suggests it's "anticipated that the Friends of Port River (FoPR) and the Port Adelaide Residents Environmental Protection Group (PAREPG) will be similarly interested in this application and provide submissions."

However, DIT, despite have a community engagement team for T2D, provided no notice to FPR and PAREPG of the DA for Lot 502. While fortuitously PAREPG saw notice of the DA, both groups only had several days before the deadline to review these extensive documents.

Land Use

While the State Government is promoting the economic development benefits of filling Lots 501 and 502, it's not apparent that they are responsive to provisions in the planning system that seek to ensure that there is sufficient land for regional and local stormwater and that development does remove existing remnant samphire habitats or threaten the ability for expansion and inland migration of such habitats.

Strategic Employment Zone

Gillman Subzone

Performance Outcome

PO 2.1

Land identified for stormwater management and habitat rehabilitation in the subzone is not developed for industrial use unless:

- a. there is sufficient land capable of managing the regional and local stormwater catchment function in the location
- b. the land unlikely to be inundated by tidal flows as a result of the periodic opening of the tidal gates, taking into account long term sea-level rise
- c. it does not result in the removal of existing remnant samphire habitats or threaten the ability for expansion and inland migration of such habitats
- d. the provision of a new or the expansion of an existing sea flood protection levee or sea wall infrastructure can be accommodated into the future

Further there seems to be complete disregard for Planning Policy 5 - Climate Change

5.5 Avoid development in hazard-prone areas or, where unavoidable, ensure risks to people and property are mitigated to an acceptable or tolerable level through cost-effective measures

5.7 Protect and enhance areas that provide biodiversity and ecological services and maximise opportunities for carbon storage

5.8 Encourage decision-making that considers the impacts of climate change and that draws on the best available information

5.9 Encourage development that does not increase our vulnerability to, or exacerbate the impacts of, climate change and which makes the fullest possible contribution to mitigation.

Site investigation

While FoPR will need the additional time, before the SCAP hearing, to more fully consider Agon's Detailed Site Investigation, it notes in the Executive Summary that

The large scale of the proposed site filling means that there is the potential for significant:

- Compression and settlement of the existing soils under and adjacent to the area filled.
- Changes to groundwater levels and flow rate, both on and offsite.
- Changes to surface water drainage patterns, both on and offsite.

These changes could disturb acid sulfate soils and cause contaminants to move via groundwater and surface water, where they could affect the environment on and offsite, both during and after the project....

Further environmental investigations are likely to be required at key stages of the project and may include the following

- The design of the SRF - particularly any excavations for site infrastructure.
- Geotechnical investigation - and how the geotechnical condition of the site may impact site establishment, filling and settlement properties, PASS/ASS affected soil and groundwater movement.
- If any unexpected results are picked up during SMP compliance monitoring (e.g. surface water, groundwater).
- Verification sampling of imported fill upon arrival on site, prior to use as lot fill.
- Validation investigation at completion of all site filling and settlement....

Groundwater results indicate that site contamination of groundwater exists, based on concentrations of chemicals above the adopted criteria. A preliminary assessment of background concentrations was undertaken with the finding that groundwater concentration exceedances may be attributable to offsite sources (with the exception of fluoride). This preliminary assessment requires additional sampling rounds to be undertaken to allow a more reliable determination of background to be completed.

EHIAR

Given the extensive reliance on the EHIAR for this development (Lot 501 and 502), FoPR was highly critical that the EHIAR was not provided publicly with the DA for Lot 501. DIT argued that the EHIAR covered both Lots 501 and 502 and was still in draft. It's understood that the draft EHIAR was provided to SCAP.

There is no EHIAR with this DA and this again raises concerns as to why this information isn't being provided publicly.

The *EPBC Self-Assessment, EBS Ecology Appendix E, March 2024* indicates that EBS are relying upon the “mitigation and management measures” in the EHIAR and based on which EBS Ecology advises that a referral to DCEEW is deemed not necessary (pp216). The EBS Ecology report says that the EHIAR was finalised in June 2024 (pp278)

Impact on Saltmarsh

When EBS Ecology were commissioned in March 2023 and completed the *EPBC Self-Assessment* in March 2024, the SRF footprint sought to exclude impact on saltmarsh, and this seems vital to their advice that a referral to DCEEW was not necessary.



Then EBS Ecology (now umwelt Australia) in January 2025 were asked to consider a revised SRF footprint and their February 2025 report indicates that

The EPBC Act Self-assessment (Version 2, dated 26 March 2024) was based on direct impact of an impact area of 86.43 ha, referred to as Option 1. Option 1 avoided all direct impact to the mapped threatened ecological community (TEC) *Subtropical and Temperate Coastal Saltmarsh* (EPBC listed as Vulnerable) which is present within the SRF site.

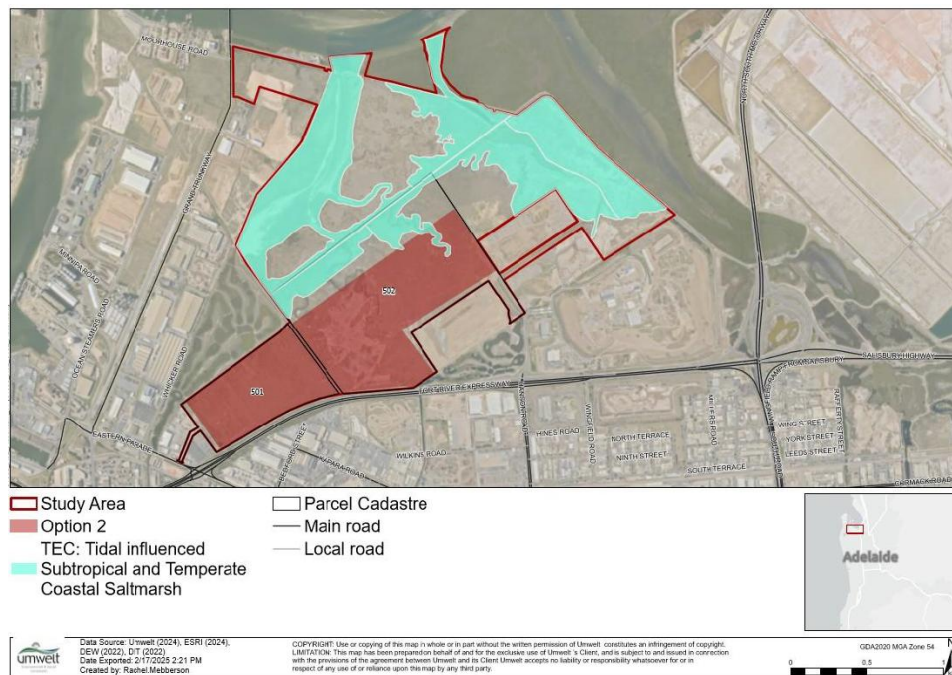
Since the 2024 EPBC self-assessment, more environmental information and information on mitigation measures has become available, as detailed in the 3 June 2024 Final Revision of the Environment and Heritage Impact Assessment Report (EHIAR) (Mott Mac 2024). In addition, Umwelt completed four targeted bird surveys in January and February 2025....

In January 2025, Mott Mac and DIT requested an Addendum to the EPBC Act Self-assessment to be completed for a larger area of 108.15 ha, referred to as Option 2 ... Option 2 directly impacts 1.11 hectares of the *Subtropical and Temperate Coastal Saltmarsh* TEC...This addendum report contains an assessment of Option 2 impacts.

So where is the “environmental information and information on mitigation measures” that “has become available, as detailed in the 3 June 2024 Final Revision of the Environment and Heritage Impact Assessment Report”?

This seems disingenuous, or worse by DIT, to have EBS Ecology prepare an extensive report in March 2024 (see pp212-273) based on limiting the impacts on saltmarsh, and then commission umwelt Australia in January 2025 to do an addendum based on an extended footprint. In barely two pages of text, 1 map and 1 photo, umwelt Australia concluded, in February 2025, that

The revised Option 2 impact area of 1.11 is unlikely to directly or indirectly cause a Significant Impact to any MNES or potential MNES habitat. Option 2 does not regularly support a population of a Critically Endangered or Endangered threatened species and does not regularly support an important population of a Vulnerable threatened species. It does not impact important habitat for migratory shorebirds.



The ‘targeted bird surveys’ undertaken by umwelt Australia occurred in January and February 2025, in one of Adelaide driest summers, and on that basis umwelt declared that there was unlikely to be Significant Impact. It stretches credibility to suggest this data shows that the saltmarsh doesn’t “regularly” support threatened species.

Further the report makes no mention of the SRF Footprint now being in much closer proximity to saltmarsh. This 24 hour noisy development, which is lit at night, is not a conducive environment to the birds the EPBC Act seeks to protect, affecting their capacity to roost and rest without disturbance.

In the section of Lot 502 that is not part of the SRF there is no protection for the saltmarsh. Mott McDonald makes it clear that this is a matter for Renewal SA. So, this development in Lot 502, encroaches significantly on the saltmarsh and the habitat it provides, degrading its capacity to support threatened species, potentially making it even more likely that Renewal SA will develop it for further low value industry. (FoPR notes that Lot 403 which adjoins Lot 502 is being developed for two warehouses.)

Site contamination

The DA identifies (pp74/75) potential unacceptable risk to Terrestrial ecosystems and Groundwater and surface water. Investigations of this aren't complete and will inform the IAA and SMP.

The EPA advised during the SCAP hearing for Lot 501, that it was not known if there was currently leaching of contaminants into the Magazine wetlands.

The information available in this DA does not ensure that the leaching of contaminants isn't occurring or won't occur into the Barker Inlet.

The Department has completed a Preliminary Site Investigation (PSI) and a Detailed Site Investigation (DSI) of the subject land and Lot 501 to inform the audit process under the WDF Standard. The PSI identified several potentially contaminating activities (PCAs), as defined in the Schedule 3 of the *Environment Protection Regulations 2023*, for the SRF site as well as various chemicals (substances) of interest (COI) commonly associated with these PCAs. A conceptual site model (CSM) detailing potential contaminant sources, pathways and receptors was developed as part of the PSI.

The subsequent DSI comprised of soil sampling and groundwater / surface water monitoring works, which assessed for the presence of COIs identified in the PSI, thereby allowing a determination as to whether a potential unacceptable risk to human health, terrestrial ecosystems, groundwater and/or surface currently exists at the site.

The DSI concluded that:

- There is no potential unacceptable risk to human health based on a future commercial/industrial land use, including the SRF operations.
 - There is a potential unacceptable risk (arsenic, copper, lead and zinc) to terrestrial ecosystems based on the site being within an area of ecological significance. Arsenic concentrations may be naturally occurring, but copper, lead and zinc may have been attributable to past Defence and rifle range activities.
 - There is a potential unacceptable ecological risk to groundwater and surface water (metals, ammonia and perfluorooctanesulfonic acid). However, the COI concentrations returned were potentially attributable to off-site sources. Fluoride was identified as a potential unacceptable risk to off-site recreational users.
- (pp74/75)

Stormwater and pollution into the Barker Inlet

FoPR made clear its concerns, as did City of PAE, that the development of Lot 501 could have adverse impacts on the stormwater services provided by the wetlands and the protection they provide for the Barker Inlet.

FPR remains very concerned about further site limitations and increased loads on the Magazine Creek and Range Wetlands, so that they can provide stormwater and environmental services to the cities of Port Adelaide Enfield and Charles Sturt. The DA indicates that the land is currently susceptible to inundation in storm events and high tides, with water pooling on the low lying watercourses on Lot 502 + potential overtopping of Range wetlands (pp76).

The DA provides

- No indication that account is being taken of higher intensity rainfall, from climate change, and an increasingly impervious catchment, that could put "unprecedented" demand on the Magazine and Range Wetlands
- For a wastewater treatment plant, of significant scale to accommodate runoff and water released by the TBM spoil. It will be released to the watercourses on Lot 502 which "have the

potential to flow into Magazine Creek basin and the Barker Inlet or infiltrate groundwater” (WTP – volume of treatment will be greater than 50ML/annum, discharging on average 500kl/day) Part 1, pp46

- Potential contamination of Barker Inlet – see para above – discharge could be greater than 500kl/day in winter, and is treated with alum for flocculation, so needs referral to EPA

The DA recognises that stormwater management requires detailed design and conditions from SCAP are needed to address this (pp47)

It is notable that with this expanded Crown development there are no guarantees by the State Government of the upgrading of the tidal gates, something that Council has been raising with the Minister for Environment without success.

Flooding

The extent of the flooding potential, without this development, is identified in the DA.

The entirety of the subject land is covered by the Coastal Areas Overlay in recognition of its proximity to the coast, the low-lying nature of the land and its interaction with coastal processes. The land is currently susceptible to inundation in storm events and high tides, with water pooling in and around the low-lying watercourses on the land (as shown in Figure 9). The land is also subject to the Hazards (Flooding) and Hazards (Flooding – General) Overlays for specific areas (see Figure 30) that do not correspond with the lowest lying areas and reflect potential overtopping of the Range Wetlands. (pp78)

Figure 30: Subject land subject to Hazards (Flooding) and Hazards (Flooding - General) Overlays¹⁰



In undertaking the Flood Modelling Assessment, the following assumption has been made:

Lot 501 is to be filled, but as this site is not subject to inundation for Lot 502 modelling purposes it has been taken that Lot 501 is already filled. Sensitivity testing was then

completed to determine the impact, if any, on the Gillman site with additional filling of Lot 502. (pp306 of 382)

FoPR is not convinced this is a valid assumption and looks forward to seeing the advice provided to SCAP from the City of PAE and the Coast Protection Board.

Interim Audit Advice (IAA)

The same problems FoPR identified with Lot 501, re IAA(s) similarly applies with this DA. An IAA was not required for stage 1 of Lot 501, and now for stage 1 of Lot 502, so approval for the DA is being sought without the benefit of the IAAs needed for the site.

It is proposed that the SRF development will be staged in the same manner as the previous application, with four stages outlined below and illustrated in Figure 28, with the process for submission of plans in accordance with conditions should an approval for this application be granted by the Minister. At each stage it is proposed to provide additional plans and details, prepare a SMP and CEMP (or update) with associated relevant subplans.

This staging approach is consistent with section 131(20) of the PDI Act, which provides that the Minister may grant an approval to whole or part of a proposed development and impose such conditions as they see fit.

An IAA under the WDF Standard is only required in relation to stages 2, 3 and 4 where filling of land from waste spoil from the T2D Project is proposed, and for the decommissioning process. At the conclusion of the project the WDF Standard requires an Audit Report and Site Contamination Audit Statement (pp55)

Hopefully it's wishful thinking by DIT that SCAP will not impose conditions re the IAAs

As per the Part 1 application, if necessary, the Department is prepared to accept conditions of approval requiring the submission of IAA and an updated SMP endorsed (by the ASCA) and accepted (by the EPA) before stages 2, 3 and 4 of the proposed development.

Blue Carbon Potential

While the stranded saltmarsh areas of Gillman still have carbon storage value, this could be improved significantly through management and conservation, and improving tidal reconnection, and planning for retreat, which could be revitalized to increase carbon storage.

If this DA is to be approved then Option 1, rather than Option 2, would lessen the threat to the saltmarsh and provide for increased opportunities for blue carbon, which is increasingly important in mitigating climate change.

If COP26 is to be hosted in Adelaide, our Pacific neighbours are likely to be interested in the extent to which we are conserving and restoring blue carbon.

Superseded

PLANNING, DEVELOPMENT AND INFRASTRUCTURE ACT 2016

S131 – CROWN DEVELOPMENT

Development Application No: 25004790 for Proposed Gillman Spoil Reuse Facility - Part 2

SUBMISSION: PORT ADELAIDE RESIDENTS ENVIRONMENT PROTECTION GROUP

The Port Adelaide Residents Environment Protection Group (PAREPG) opposes the Development Application for the Gillman Spoil Reuse Facility Part 2 for the following reasons:

The planning environment

While a number of high-level reviews have found the land suitable for commercial development, it must be noted that it is only now that more detailed environmental assessments are being considered.

The Development Application states:

"It should be noted that noise from truck movements and 24-hour operations is a specific outcome of the zoning of the site, whereby industrial, warehousing and logistics uses are intended to operate." p74

It should also be noted that the any environmental assessments undertaken for this development application are not of an environment in its normal state. The Bureau of Meteorology finds rainfall since February 2024 to be in "serious deficiency" with rainfall totals in the lowest 5-10% on record.

Lack of Public Notification

While the Development Planning report specifically notes the interests of (PAREPG) and the Friends of Port River (FoPR) in this development, no notification was provided to these groups when the Development Application period commenced, leaving only days to respond once we discovered the Development Application notice.

PAREPG feels this shows considerable disrespect for the views of well-informed local environmental groups, especially as Part 2 of the Gillman SRF is by far the most extensive and critical area to be damaged by infill.

Transparency

PAREPG notes that the Environment and Heritage Impact Assessment Report (EHIA) for the Gillman SRF is still not publicly available. As this report apparently outlines management and mitigation measures for the site, we feel it is very important for it to be public so we can understand what these measures might be and their adequacy in preventing environmental damage to this sensitive saltmarsh and marine area.

Impacts on birdlife

The EPBC Self-Assessment for this Development Application does not consider the disturbance factor of a noisy, continuous operation on the the Spoil Reuse Facility (SRF) development site on birdlife within the adjoining Magazine Creek wetland or the coastal saltmarsh habitat between Lot 502 and the Port River.

There is no effective consideration of the effects on birdlife in these areas from not only the continuous noise of trucks and machine but also light pollution and dust involved in the depositing of tunnel spoil on the site over many years.

These conditions are not suitable for migratory species and many residential bird species.

Our own investigations have shown a surprising volume of bird life and we invite SCAP members to visit the area in the early morning when they may be equally surprised.

PAREPG questions how the SRF is going to be managed in a location that is adjacent to areas visited by EPBC declared bird species without considerable impact on feeding and roosting in these wetlands.

Impacts on saltmarsh and ground water

While the Lot 502 development deals with the treatment and management of water runoff or accumulation on the SRF site, there is little consideration of the impacts of 4 million tonnes of spoil being deposited on the groundwater and tidal creeks of the Magazine Creek Basin north of the site. As we all know, the groundwater and creeks may well be contaminated or conduct contamination from beneath the Lot 502 site into the saltmarsh and marine environment.

The application is not clear when considering saltmarsh areas. Figure 4, *Proposed SRF Impact Area and mapped TEC (Threatened Ecological Communities)* is unclear in that the TEC are denoted as “Tidal Influenced” and in white, but no white area is apparent. The remnant coastal creek in the north east of Lot 502 clearly has temperate saltmarsh and is shown in Figure 3 as being impacted, but is planned to be within a revised SRF footprint boundary.

Impacts of flooding risk and sea level rise

Filling this site and using it for industrial development considerably reduces the capacity of the Gillman/Magazine Creek Basin to deal with potential increases in stormwater flooding events and sea level rise.

Slow moving pressure systems seem to becoming increasingly frequent in determining the extent of both rain and heatwave periods so it's important that detention volumes be sized adequately.

Lost opportunity for Blue Carbon development

The Gillman area is ideal for developing blue carbon storage for Adelaide, thus increasing our city's ability to reach net-zero emissions of carbon pollution.

Recommendations:

- **That the boundaries of the application area be redrawn such the northern boundary of Lot 501 be extended to form the northern boundary of Lot 502, reducing the area of Lot 502 so that the area of saltmarsh destruction is minimized.**
- **That any approval contains a provision to shield adjacent bird communities from noise, dust and light spill to the satisfaction of both Green Adelaide and the Department of Environment and Water. That provision should be a condition of development approval rather than a CEMP sub-clause.**

PAREPG wishes to be represented at the SCAP hearing

Liz Millington
Secretary
Port Adelaide Residents Environment Action Group

e: parepg@parepg.org.au

16 April 2025

Updated Representation

PLANNING, DEVELOPMENT AND INFRASTRUCTURE ACT 2016

S131 – CROWN DEVELOPMENT

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3. Transparency

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6. Impacts of flooding risk and sea level rise

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Slow moving pressure systems seem to becoming increasingly frequent in determining the extent of both rain and heatwave periods so it's important that detention volumes be sized adequately.

7. Lost opportunity for Blue Carbon development

The Gillman area is ideal for developing blue carbon storage for Adelaide, thus increasing our city's ability to reach net-zero emissions of carbon pollution.

Recommendation:

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16 April 2025