



Applicant:	Peninsula Ports Pty Ltd
Nature of Development:	Port Spencer Grain Export Facility – variation to previous development authorisation - expansion of the project area boundaries to accommodate design changes to the bunker storage and truck marshalling areas, including related civil and drainage works.
Development Type:	Impact Assessed Development – amendment to the Public Environmental Report (s114 of the <i>Planning, Development and Infrastructure Act 2016</i>).
Subject Land:	Lipson Cove Road, Lipson (various parcels).
Close Date:	21 October 2022

Name	[REDACTED]
Contact Number	[REDACTED]
Email Address	[REDACTED]
Phone Number:	[REDACTED]
Postal Address:	TUMBY BAY

What is your interest in the proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other WRONG LOCATION FOR GRAIN EXPORT.

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

IT IS IN THE WRONG LOCATION, BOTH ECOLOGICALLY, ENVIRONMENTALLY AND ISN'T SUPPORTED BY LOCAL COUNCILS AND EP&D BOARDS AND DOESN'T A "SOCIAL LICENCE" FOR THIS LOCATION

Scan and email to: spcreps@sa.gov.au

Post to: Minister for Planning
Attention: Robert Kleeman
Planning and Land Use Services – Department for Trade and Industry
GPO 1815 Adelaide SA 5000

What could be changed and/or further clarification provided to address your concerns?

DO YOUR RESEARCH AND SEE WHY CONTRACT METALS
DECIDED NOT TO PROCEED WITH THIS SITE.
ITS ACCESS IS (OFF THE HIGHWAY) ON A
WINDY ROAD ~~IS~~ NOT SUITED TO ROAD TRAINS
AND TRIPPLE ROAD TRAINS.

Are there any other general comments or feedback you wish to provide?

IT IS BEING DRIVEN BY DIRECTORS WHO
HAVE NO OR LITTLE KNOWLEDGE OF THE AREA
AND HAVE NO AFFILIATION WITH THE GRAINS
INDUSTRY OR EYRE PENINSULA.
IT BOASTS 470 (?) SHARE HOLDERS OF WHICH SHARES
ARE UNTRADEABLE AND SHAREHOLDER HAVE NO RECOURSE
OR SAY. — IT'S A PIE IN THE SKY PROJECT THAT
WILL HAVE DETRIMENTAL EFFECTS FOR THE SITE AND
EP FARMERS AS A WHOLE.

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate if you object to your submission being made available in this way. Personal contact and address details will be redacted.

Following preparation of the proponent's Response Document, the State Planning Commission will prepare an Assessment Report, with the final decision to be made by the Minister for Planning. For further detail on the Impact Assessed development pathway go to: [PlanSA: Overview How applications are assessed](#)

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- Neighbour
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- Landowner
- Other

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

For the 20th time, the majority of locals don't want a Port between Lipson Cove & Rogers Beach! The company that are pushing it had 468 farmer shareholders, but most of these disengaged with the company at least 10 years ago. There are only 2 farmers left on the Board of the Free Eyre/Port Spencer project. There is a good reason for that! No one wants this project to go ahead.

It is rumored that Loadstone Mines are now purchasing the northern blocks to the Port Spencer land, which was 2 years ago publicly stated by Peninsula Ports , to have been purchased by them, but with nothing going through council that was obviously not true at the time!

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What could be changed and/or further clarification provided to address your concerns?

The project be cancelled

Are there any other general comments or feedback you wish to provide?

After several months of complaining and responding to previous PER with no change, I decided to join the group planning the Cape Hardy Port development 8km north of Port Spencer. The majority of people can see that the sensible choice is to have a multi commodity Port at Cape Hardy. Port Spencer is actually called Lipson Cove and Rogers Beach and does not have social licence for a Port and never did have. When Centrex metals bought that site years ago, locals were picketing against the development. Free Eyre/Peninsula Ports purchased that land with an expired major project status, knowing full well that the local people did not want a Port at Lipson Cove.

The social licence for a Port is much stronger with Cape Hardy & we have the support of the adjoining farmer landholder. Thats why I now put my time and effort where my mouth is!

We don't need nor want 2 Ports within 10km or each other, its ridiculous. Those few people still involved with Free Eyre (Peninsula Ports) are just trying to get their money back on a stupid decision they made to purchase the old Centrex site.

I have evidence of families camping at Lipson Cove dating back to 1934. Lipson Cove and Rogers Beach go hand in hand. There is a great deal of local, social ownership over this family camping & day tripping area. At some point, common sense must surely prevail before a beloved location is destroyed forever by people desperate to WIN!

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What is your interest in the proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other LAND OWNER AT LIPSON, CAMPER OF THIS AREA

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

ANSWERS ON 2ND PAGE.

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Port Spencer Grain Export Facility

Public submission on the Amendment to the PER

- This development will disturb the birds, fish & wildlife. There are endangered birds in this area, including penguins on Lipson Island. The endangered species will become another casualty on the extinction list with all the activity and buildings in this fragile coastal area. Whales have been seen and photographed in this area. Dolphins are always in this area.
- The local Council will definitely have to spend a lot of money widening roads for this port to happen. The Council money would be better spent on the roads and infrastructure that currently needs updating and improving. This port will put more stress on Council funds for the rest of the community.
- The Eyre Peninsula is sparsely populated. Where will they find the staff to operate this facility? I know that a lot of gray nomads, backpackers and students come in to work at the other grain facilities, but they still need more. Where are staff to find accommodation. Yes, Tumby Bay and Port Neill have caravan parks and other accommodation. Then what happens to the locals and tourists who fill all accommodation in these areas from Christmas to the end of the school holidays. This period is also the busiest times for grain facilities.
- Locals and tourists have been camping, fishing, surfing and visiting around this magnificent area for years. At Easter 2022, there were 41 caravans, camper trailers and tents in the Lipson Cove – Rogers Beach area. It's an extremely popular area. People camp in these areas rain, hail and shine. It's a safe area for all to swim and play in. Exercise and fresh/clean air is important to all humans and animals. We don't need this fantastic area destroyed.



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What is your overall position on the proposed development?

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- I oppose the development

Do you have concerns regarding the proposed development?

We are one of the neighbouring farmer landowners to the proposed Port Spencer Grain Export Facility. We have not been consulted in relation to the impacts of blasting, rock crushing, Lipson Cove Road expansion / design or time frame which could affect our grain and livestock farming practices

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What could be changed and/or further clarification provided to address your concerns?

Our community do not want a port at Fort Spencer, we never have. Fort Spencer does not have social licence within the local community. Lipson Cove and Rogers Beach are both very popular camping locations and one of our best tourist attractions (Lipson Cove), why allow this important and pristine area to be ruined when we have a perfectly workable (and largely accepted) alternative only 10km further north at Cape Hardy.

Are there any other general comments or feedback you wish to provide?

For many years we have attempted to get Government decision makers to understand the intense community opposition to a port at Fort Spencer for very valid social and environmental reasons. It is well known that Eyre Peninsula farmers are not favourable towards Fort Spencer but support the Cape Hardy project. We are shareholders of the company Free Eyre Ltd (aka Peninsula Ports) and we do not support the Fort Spencer Project.

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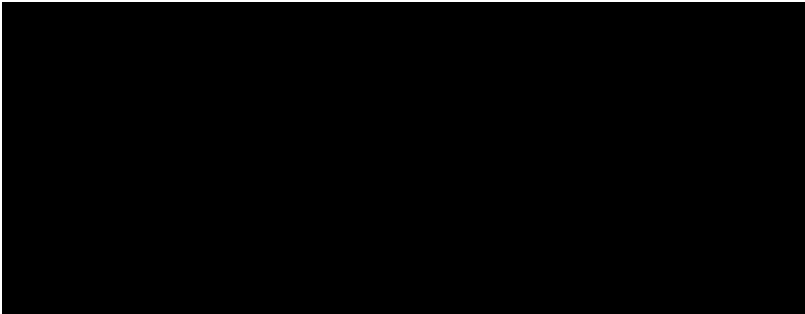
RESPONSE TO AMENDED PER/EIS, PT SPENCER

To:

Minister for Planning
Attention: Robert Kleeman, Manager Crown and Impact Assessment
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815 ADELAIDE SA 5000

scapreps@sa.gov.au

Respondent:



Please find attached a submission for consideration on matters arising from the proposed amendments to the PER/EIS pertaining to the Major Development Project – Pt Spencer.

The submission has been prepared in consultation with owners of land adjacent to the proposed facility and in the full knowledge of the development of this project since its inception with the original proponents, Centrex Metals Ltd.

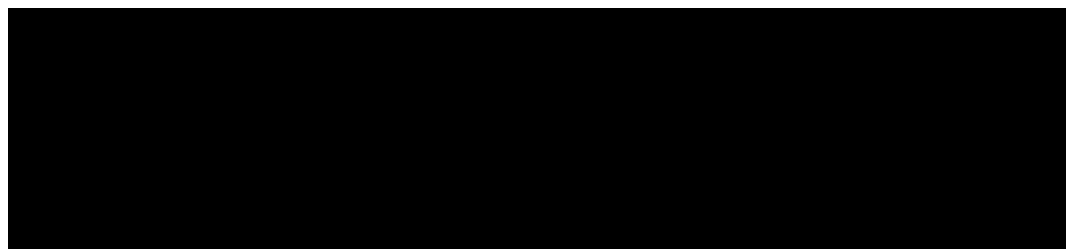
A response to the amended project in 2019 when the current proponents Free Eyre and Peninsula Ports had been lodged by the author of this response.

It is also acknowledged the more recent amendment pertaining to the status of Swaffers Road.

In more recent times (8th August 2022), a Freedom of Information request has been lodged with the District Council of Tumby Bay in relation to its position being its 'reasonable acceptance' of the conditions as outlined in the Development Authority of 2019 (as amended). Information from this enquiry has been provided in the response.

Should there be any clarification of issues raised, please contact me via email or mobile.

Yours faithfully,



20 October 2022

Submitted by email

CONTEXT OF THE AMENDMENT

The only changes being proposed to the approved PER are:

- Increased paved surface for **increased heavy vehicle marshalling**, with a resulting increase in stormwater management asset sizing, noting that the reorientation of grain storage bunkers from a N-S orientation to E-W (as generally described in the response document) was approved via the current authorisation;
- **Expansion of the project area** to include 40m of an adjacent road reserve on the Western and Northern boundaries of the site;
- Formalisation of the process of **staged submission** of construction issue drawings and other documentation **to demonstrate compliance with development authorisation conditions** in a staged manner in line with construction staging.

INCREASED MARSHALLING AREA – CHANGE IN BUNKER LAYOUT

“The alignment of the bunkers to an E-W orientation allowed a significant increase to on-site truck marshalling areas to further reduce the risk of heavy vehicles queueing onto Lipson Cove Road. It also allowed the noise and dust sources to spread over a larger area of the site rather than being more concentrated to the Northern area of the site.”

“The harvest season at Eyre Peninsula represents a period of intense grain delivery at the proposed facility and is expected to last for approximately 2 months between mid-October and mid-December. During this time, there will be a high number of trucks entering and leaving the site during the day and until approximately 10 pm.”

“The truck marshalling area has been increased to provide parking for all trucks arriving at site during operating hours, thus avoiding the possibility of them being lined up along Lipson Cove Road awaiting entry to the site and reducing the impact upon any through traffic in the area. Prior to entering the Facility an allowance has been made to provide up to 10 unmarked truck parking spaces for those vehicles arriving at the Facility outside of operating hours. A portion of this allocated area will be unsealed. During harvest heavy vehicles will be able to arrive after hours and park in the primary staging area, enabling drivers to sleep in their vehicles overnight without disrupting Lipson Cove Road.”

INCREASED ON SITE HEAVY VEHICLE PARKING

“Marshalling space for 70 triple road trains is enabled through the re-orientation to an E-W bunker alignment and expansion of the marshalling area to the South end of the site. It represents an increase of 40-50 additional A-triple road train positions on site compared with the submitted N-S configuration.”

“Peninsula Ports has reached agreement with the District Council of Tumby Bay (DCTB) to acquire the 40m of additional land through the acquisition of part of the adjacent road reserve. DCTB has completed its necessary processes to deal with the change to the road reserve size (reduction from 60m to 20m) and enter into the transaction with Peninsula Ports.

As part of the agreement between Peninsula Ports and DCTB to acquire the 40m of the current road reserve that reaches Rogers Beach, Peninsula Ports has agreed to establish an all-weather access adjacent to the Western and Northern boundaries of the expanded site (refer to Figure 2) along the remaining 20m road reserve to improve access to Rogers Beach. This all-weather access is not a change under this amendment as it sits outside the project site area and will be approved through DCTB as works inside a council road reserve.” (underlining added)

IMPLICATIONS OF PROPOSED CHANGES

It is noted that the re-orientation of the bunker layout and the additional space acquired as a consequence of the purchase of 40 metres of the unmade road from the District Council.

What is not clear from the information and the new proposed layout represented in the amendment is how the additional triple road trains will be accommodated on site.

Further the provision of overnight parking is supported, but the specifics of where this parking space is located AND what happens when the designated space (10 triple road trains) is exceeded.

Such an occurrence is a reasonable assumption given the area over the Eyre Peninsula from which it suggests grain will be delivered.

What is not clear is the actual size of the triple road trains, 36 metres or 53 metres in length.

It is a reasonable hypothesis that the overflow will spill onto Lipson Cove Road thereby presenting a road hazard, given that the suggested entrance is at the base of a decline which limits significantly a line of site for those who may be travelling towards Lipson Cove.



(Image DSC-0301-1: Looking east from top of decline to entrance gate of project site, Farm gate directly opposite. Road width (fence line to fence line) approx. 19 metres)

The significant detail to provide a considered opinion on this issue is the design of Lipson Cove Road in this area and for the remainder of the roadway to the Lincoln Highway, as an indicative width of the current roadway at this point of access to the port and an adjacent farm access point is about 19metres. The problem being the actual width of the proposed roadway (with suitable run-off and shoulders) has not been provided. Will the new roadway accommodate parking of road trains (triples) east of the entrance gateway and up the incline thereby limiting the safe passing corridor for private vehicles, including caravans and boats (being late arrivals at the Lipson Cove Camping ground).

Parking on Lipson Cove Road may also limit owners of land moving farm machinery in daylight hours on the Lipson Cove Road.



(Image DSC-0307-1: Eastern boundary of adjacent owner of land, unmade road(DCTB) and western boundary of project)

A supplementary concern with traffic safety is whether the adjacent owner of land will be required to relocate access gateways along the Cove Road. It should be noted, despite a requirement of the Development Authority, no consultation from either the proponents or Council (to assess its reasonable acceptance of the impact) has occurred at the time of writing.

A further concern is the line of site for vehicular traffic moving towards Lipson Cove and those from the Cove to the proposed exit from the site.



(image DSC-0308-1: Line of sight downhill from proposed exit, travelling West)

Again, given the lack of information pertaining to the re-design of the Cove Road, the risks associated with 'normal traffic' to and from the Cove and the meeting of road trains exiting from the facility cannot be assessed at this time but is critical to the outcomes of the proposed changes.

It is understood that a formal assessment of Lipson Cove Road to cater for the suggested number of b-Doubles and triple road trains (of unknown length (36m or 53m) has yet to be undertaken.

EXPANSION OF THE PROJECT SITE and ACCESS TO ROGERS BEACH

It is noted the process of consultation with the District Council of Tumby Bay in relation to the unmade road surrounding the project site.

It is further noted that the new boundary has been accepted by both parties with a detailed survey completed.

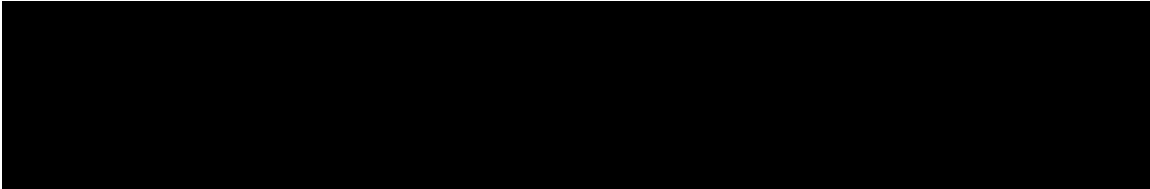
It is noted that the purchase of the identified land has not been completed.

Associated with these discussions has been the question of access to Rogers Beach, noting that the access point the community has used over the years in agreement with the previous owner of the land, is now on the proponent's land. As a consequence, access to the beach will now be via the reduced unmade road width on the northern boundary of the project site.

The unresolved debate being at what point will access be granted,

At the briefing session between Council and the proponents on June 21st 2022, the issue was raised with a suggestion from the proponents being an easement on the project boundary western side from the unmade road to the north to the current 'camping ground'.

However, as a result of a Freedom of Information (lodged 8th August 2022) enquiry on the District Council of Tumby Bay, the following email was provided.



Subject: Barngarla requirements for access route to Rogers Beach

Attachments: Attachment 1 - AAR detailed EIS comments.pdf

Follow Up Flag: Flag for follow up

Flag Status: Flagged

Damian,

For your information I thought that I would provide to you with a copy of the AAR Agency comments with respect to our amendment to the EIS which includes the expansion of the site through the purchase of 40m of road reserve.

See attached. The advice states:

The all-weather access road outside of the Project area will traverse a known Aboriginal site. The Proponent should work with BDAC to ensure it does not damage, disturb or interfere with that site when enhancing this road, or else seek authorisation under section 23 of the Act to do so if that is not possible.

AAR advised at the 22 April 2022 stakeholder meeting that should the Proponent seek to upgrade the Rogers Beach access track, the upgrade should be constrained to the existing track where it runs south alongside the sand dune campsite recorded by Dee Goring and BDAC (2020 survey report map 3).

Upgrading the track should either be risk managed with BDAC (ie constructed to avoid impacting the site) or if impacts to the site are unavoidable, authorisation should be first sought from the Minister under the Heritage Act.

On 22 April 2022, AAR wrote to BDAC recommending that the Aboriginal heritage sites recorded by Ms Goring (Site 1 - sand dune Aboriginal campsite and Sites 2 and 3 - rock outcrops) be submitted to AAR's central archives. Lodging heritage site cards would assist with better site protection and management going forward.

In brief the Barngarla still require us to stop vehicular access into the camping ground inside the sand dune on Rogers Beach. (underlining added)

Regards,

Greg

Greg Walters

Chief Executive Officer



Your attention is drawn to the portion of the above underlined.

The Aboriginal Heritage and the environmental sensitivity of this area is well known and should be protected.

A copy of a proposition provided to the District Council of Tumby Bay as a potential solution to the impasse is included as attachment 1.

A further point of concern arose from the meeting of the 21st June, was the statement made by the proponents that they are NOT considering any involvement in the preparation of a 'Rogers Beach Management Plan' as required by the Development Authorization.

It is considered that such a position is untenable and a Rogers Beach Management Plan involving consultation of all parties (including the community) is an essential part of the environmental management plan for the project per se. Of concern is the detail impacts of the proposed groyne and sand movement of the beaches of Rogers Beach and Lipson Cove in particular in addition to Aboriginal Heritage and protected species.

2.2 EXPANDED SITE AREA

2.2.1 Impact of change -air quality

“The key air emissions expected from the grain facility are dust emissions resulting from the unloading, storage, handling, and ship loading operations. In addition, there will occasionally be emissions of methyl bromide gas from the silos as a result of fumigation of the grain. Methyl bromide is used as a pest control treatment for grains which is applied at storages prior to export.”

“The CALPUFF (version 7.3.1) model was used to predict ambient pollutant Ground Level Concentrations (GLCs) for the estimated dust and methyl bromide emissions associated with the operation of the grain facility.”

Whilst the proponents have identified the key sources of pollutants arising from the ‘normal’ activities of an operational port, the expansion of the facility as outlined, increases an additional (estimated) 40-50 road trains (presumably triples) on site.

What is not clearly articulated is the total number of road train on site on a daily basis (7am to 10pm).

The total number of vehicle movements being double this figure (entering and exiting).

In addition to what can be described as ‘normal’ dust level (being grain dust) generated on site, there exists a significant quantity of diesel fumes and particulates arising from the heavy vehicles and the operation of the site’s diesel generator, which appear to be omitted from consideration.

The diesel exhaust gases and particulates are known carcinogenic emissions.

Given that the ‘parking area’ is now closer to Lipson Cove Road as a consequence of the re-orientation of the bunkers, the point source of diesel fumes and particulates is closer to the Lipson Cove Camping area and obviously, the adjacent owner of land.

Questions arising:

Whilst it is assumed that minimum emissions of methyl bromide may occur, what are the Occupational Health and Safety exposure limits required under the WorkSafe legislation?

Secondly, in the case of a major industrial accident resulting in the significant release of methyl bromide and having regard to the site-specific wind direction pattern over a 12 month period, what is the dispersion of such an occurrence in relation to adjacent owners of land and the Lipson Cove Camping area and estimated PM10 and PM2.5 exposure concentrations?

Further methyl bromide is known to be hazardous to humans, being a neurotoxin with absorption pathways via the respiratory system and through the skin.

The question now arising is the unknown impact upon farm stock of adjacent owners of land in the event of a significant discharge of the gas as a result of an industrial ‘accident’?

What mitigation strategy exists to minimize such an occurrence?

It is known that methyl bromide is an ozone depleting chemical and its use regulated under the UN Montreal Protocol. It is acknowledged that exemptions for the use of the chemical in certain activities such as fumigation of grain. It is assumed that the relevant permits have been (or will be obtained) for its use at the port.

What alternative fumigant is available for commercial use that has a lesser hazard rating to humans stock and especially on the environment?

Given the significant increase in heavy vehicle capacity of the site and the corresponding increase in diesel emissions, and having regard to the **site-specific wind direction pattern** over a 12 month period, what is the dispersion of such pollutants in relation to adjacent owners of land and the Lipson Cove camping area? What is the estimated PM10 and PM2.5 exposure concentrations as a consequence of this increased activity?

It is noted that the modelling excluded the gases and particulate emissions from all sources on an operational site.

It is further noted that the data sources for the modelling have not been included in the amendment. The question now being what is the source of the weather parameters used to populate the 'model'? Was the data used from the Bureau of Meteorology (BoM) (Lincoln Airport, Poonindie site) some 70 kilometres south of the site OR from on-site weather observations over at least 12 month period?

Given that the Centrex modelling of air quality focused upon the dispersion of iron ore dust, the question arises as to the environmental impact of the now identified 'dust and pollutants', especially in relation to the marine environments, noting the environmental sensitivity of both the Rogers Beach and Lipson Cove precincts?

Given that Australia is moving to reduce its overall emissions contributing to climate change, what is the carbon footprint of the proposed site during the construction phase and, in particular the operational phase? Is it compliant with current and proposed 'standards'?

What is not clear from the information provided is the location of the expanded space achieved by the increase in site area and the re-orientation. Figure 1 does not identify such spaces.

Further, it is noted that parking space outside of operating hours for 10 triple road trains, but the location of this parking area is not identified on Figure 1.

Whilst this is to be supported, the question being is this sufficient to avoid the parking of triple road trains on Lipson Cove Road after hours (overnight). Such an activity would present a potential road traffic hazard to commuters on the Cove Road, especially given the proposed time frame.

It should be recognized that the Lipson Cove Road dips reasonable sharply over a crest to the proposed entrance to the port facility. Any road train parked west of the entrance potentially raises a significant road hazard given the reduced line of sight prior to coming over the crest. (see image DSC-0301-1)

The biosecurity of these emissions on adjacent owners of land and their agribusinesses is not addressed.

2.2.2 Impact of change – noise

It is recognized that noise assessments may have been undertaken previously both within the original approval process for the PER as applied to Centrex Metals Ltd for the principal export of iron ore, and a desktop re-assessment for the proposed changes to focus upon grain export.

Whilst reference has been made to previous assessments, the issue now is noise emanating from the proposed re-alignment of the facility as shown in the introduction which involves some relocation of equipment and vehicular management.

It is assumed that the data used to propagate the various models is reliant upon weather observations pertaining to the site and NOT data from BoM weather observations at Pt Lincoln airport (Poonindie). (see earlier comments on this issue)

The information and discussion included in the amendment proposal (pages 16-21) appears to be relevant to the original design and not the new design.

It is also relevant to the operational aspects of the project.

That being the case, it appears that the significant noise impact of the suggested number of heavy vehicles accessing and exiting the site, is not included in the discussion.

In addition, it appears the environmental noise impact upon adjacent owners of land, especially those on Lipson Cove Road arising from the very significant number of heavy vehicles accessing and exiting the port facility potentially on a 24 hour basis (nominal opening hours 7am to 10 pm with additional access for arrivals after closure), has not been considered. Given the topography of the area through which the road trains pass, the use of engine brakes and the noise so generated is potentially significant.

This noise needs to be assessed at each homestead location and the risks (impacts) duly assessed.

This is a key impact of the port project on the amenity of the area, one which appears to have been overlooked.

It is understood no noise assessment at each residential site has been undertaken either by Centrex Metals or the current proponents.

A further factor that is omitted in the discussion is the noise in the form of infrasound (very low frequency noise) emitted from machinery. Given the operational time suggested and most likely an extended period of machinery operation during boat loading, the issue of infrasound impacts needs to be assessed particularly on receptor sites B and C having regard to the topography of the area.

The impact of noise on the marine environment especially in the operational mode appears to be minimal in content. It is suggested further information be provided in relation to the operation of the ship loader and its noise print on the marine environment which may affect whales, the small penguins which habit Lipson Island, and other species in the area.

2.2.3 Site Storm Water

“A decrease in **total catchment discharging to Roger’s Beach** with the construction of a flow attenuation basin on the major creek upstream of the site to reduce the 1% AEP event storm flow.”

This appears to be at odds with previous statement indicating **no** storm water to flow into the marine environment.

It is noted the proponent’s intention to capture a significant quantity of storm water thus providing a source for ‘internal’ use.

It is noted that the proponents have indicated that there will be no connection to a water supply, eg SA Water.

It is noted that a three inch water main (SA Water) is located on Lipson Cove road and terminates at the intersection with Coast Road.

Questions arising:

1. It is noted that the proponents intend to discharge excess storm water into the Rogers Beach bay. That being the case, the location of such a discharge point needs to be identified.

Of further concern, the quality of storm water to be discharged may well contain pollutants, hitherto unidentified creating a problem of unknown proportions in the marine environment.

It is known that a condition of ‘authority’ requires the proponents to enter into the creation of a Rogers Beach Management Plan in association with DEW and the District Council of Tumby Bay (DCTB).

At a briefing session with DCTB on 21 June 2022 which was attended by the author, the comment was made by the proponents that they will not be undertaking such an activity.

The area in question is environmentally sensitive as well as having a significant Aboriginal Heritage.

In this regard, the environmental credentials of the proponents must be called to account.

2. It is noted that there is a significant volume of water accumulated the various retaining ponds. The question is upon what data is the proposed volume of storm water captured based.

The issue of data source for weather impacts has been raised previously in this response. If there is a reliance upon the BoM data for Pt Lincoln, then the annual rainfall at the site is a considerable over estimation. The variation being some 24 inches at Poonindie vs 12 inches at the adjacent property on an annual basis.

If this is the situation, then questions must be raised in terms of meeting water requirements for fire fighting (in the event of on-site specific incident or bush fire). It should be noted that the nearest CFS unit is at Warratta and thence Tumby Bay and no local hydrant to access water for firefighting purposes.

Further questions must be asked as to potable water for staff use and a water supply for toilet facilities. In addition, what provision is made for the disposal of gray water?

The location of a flow attenuation basin on the major creek upstream of the site is not marked on the site map.

“Three detention basins for site storm water runoff....to prevent discharge to the marine environment” appears to be a contradiction with previous statements made in relation of discharge

of water into Rogers Beach bay. Clarity of the design is sought especially in light of the position expressed by the Aboriginal authority and an inferred position of no access across the area.

2.3 Staged approvals for construction

2.3.1 Proposed staging

It is reasonable to assume that projects will have some form of staging to facilitate construction and operational phases.

However, such programs are required to be compliant with the conditions of the Development Authority.

[In reference to the proposed table of staging, attention is drawn to item 1: silo pad and earthworks – blasting October 2022.](#)

It is reasonable to point out that the compliance with the Development authority appear not to have been met on the following points:-

- 1 failure to consult with adjacent owners of land in relation to the impact of said activity inclusive of associate activities of rock crushing on a proposed 24/7 basis and fugitive lighting to allow night-time work
2. failure to provide a security fence around to complete site to exclude members of the public, and
3. failure to undertake appropriate plantings to screen activities (enhancing the amenity of the site.

Associated with the blasting activities are issues with noise, dust, contaminants within the rock dust (especially free silica) and biosecurity issues of contamination to cropping and animal husbandry on adjacent properties yet to be addressed.

[It is known that the proponents, in consultation with Local Government, is to generate a road management plan as a condition of 'approval'. It is noteworthy that the proposed staging schedule fails to raise this issue as an activity that should be being undertaken concurrently to ensure that the transport routes to the port are actually defined and any required work can be undertaken to meet the proposed operational date.](#)

Enquiries as to progress in relation to this has yet to achieve any results.

It is known considerable concern exists, particularly in the District Council of Tumby Bay as to who is responsible for the maintenance and replacement of roads identified as transport corridors to service the Port.

It is known that the only road for which the proponents are responsible for redevelopment is the Lisbon Cove Road at an estimated cost of \$8M (2020 dollar value). All other roads, being Council roads remain the responsibility of local government.

This position has been confirmed by the Minister for Planning (attachment 2) and the Minister for Transport (attachment 3).

It is known from discussion in Council (DCTB) that the East West link from Yeelanna to the Pt Lincoln Highway (the dog fence road) would cost of the order of \$50M (current dollar value) to bring to the appropriate standard for road train use. This road meets the Lincoln Highway and the Kiandra Road to Cape Hardy (rather than servicing directly Pt Spencer).

The East-West corridor, being essential to bring grain from west of the Tod Highway, is but one road requiring upgrade to road train (triple) standards.

For the record, a cost of \$50M for the District Council of Tumby Bay represents 50 years of discretionary spending on roads (at the current rate of \$1M per annum) from a total annual budget of approx. \$4.5M, a position not sustainable for the ratepayers of the District.

The Ungarra to Lipson/Lincoln Highway has been assessed for road trains up to 36.5 metres in length (level 3A) and has a number of issues requiring attention.

An issue apparently not address is the potential for road trains (triples) of 53.5 metres accessing this road.

The questions being (a) will the route be assessed to ensure such vehicles can access the road, and (b) conformation that the new bridge has been designed to accommodate such loads.

It is noted in the assessment report that the intersections with the Yeelanna/Ungarra Road and with the Lincoln Highway require redesign. The question being does the design indicated in the aforementioned report accommodate the potential requirement for 53m road trains (triples) exiting onto the Lincoln Highway and entering from the Lincoln Highway? The location of this intersection and the proposed increase in vehicular traffic of the nature described raises significant concerns for public safety of road users.

This road (Lipson to Ungarra) provides a link to the East-West proposed road link to service Pt Spencer.

The outcome of the enquiries relating to the cost of road upgrades and continued maintenance has lead to the conclusion that the Government of the day has effectively transferred the cost of the transport model proposed to local government and ratepayers. Such a position is untenable and unsustainable, especially for small Councils impacted by this project.

The suggestion that Councils can apply for road grants on what is assumed a 50-50 basis is to the general community, untenable. The position must be the proponent pays for upgrades and continued maintenance and this is considered to be the advice from the Local Government/Proponent to joint committee to the Minister on the issue. Such an outcome equates to the community benefit achieved by having the port constructed in its District.

It is noted that the proponents have suggested that a road tax may be an option for consideration, but this has not been put to the public test.

The proposed model of farm gate to port delivery system in the current circumstances, is not economically sustainable.

The proposed staging schedule fails to consider that any road works that require (a) assessment and (b) actual work will not be undertaken within the suggested timelines as outlined in the schedule. There exists the possibility that deliveries using B-triples (heavy vehicles) on non-approved roads will not be permitted by those who have the authority to issue permits. Such restrictions would impact upon the expectations of the proponents to meet their 'targets'.

Whilst this response deals with factors pertaining to the construction phase of the project, there is a community expectation that full compliance with all conditions and reserved matters outlined in the Development Authorization for not only the construction phase BUT ALSO for the operational stage will be met.

In short, the approval process to date requires greater transparency and compliance on behalf of the proponents. Social license is dependent upon achieving this.

APPENDICES

1 Concept Development Plan for Rogers Beach – Lipson Cove

Ms R Hayes
Chief Executive Officer
District Council of Tumby Bay

19 August 2022

Dear Ms Hayes.

RE: Pt Spencer – Lipson Cove precinct

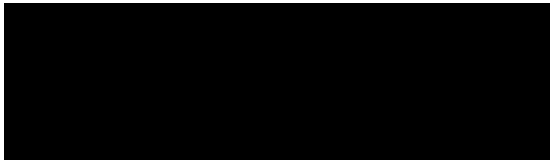
In the event that the development of Port Spencer proceeds, I believe there is an opportunity to:-

- a. create a 'concept management plan' for the precinct, and
- b. seek the appropriate funding to undertake the proposed work from participating entities.

In the event that the port does not eventuate, the draft concept plan may well serve to generate a master plan for the precinct for which grant monies may be sought in the future to undertake the work.

To this end, a draft concept plan is attached for Council's consideration.

It is suggested that the Tumby Bay Progress Association may also be interested given, as I understand, there has been past suggestions of creating a walking trail from Tumby to the Cove area via the Crown Land/Conservation Zone along the coast.



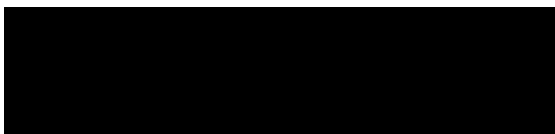
2. Correspondence from the Hon N Champion MP, Minister for Planning

(reference number: 22MP04389, 11/7/2022)

3. Correspondence from the Hon T Koutsantonis MP, Minister for Transport and Infrastructure,

(reference number: 22MIT1108, 9/9/2022)

Acknowledgement of source of images:



LIPSON COVE – ROGERS BEACH DEVELOPMENT OPPORTUNITY 2022



INTRODUCTION

The opportunity exists to create a development plan for the future of the Lipson Cove – Rogers Beach precinct having regard for the activities currently being planned, namely:

1. The development approval for Port Spencer
2. The current application for a Governor's Proclamation providing access from the port facility across Crown Land with a 150+ metre corridor which prevents access from Lipson Cove to Rogers Beach
3. Having regard to the environmental sensitivity of the Rogers Beach surrounds and the now involvement of Landscape SA Regional Board study
4. The known habitat of the Rogers Beach as a nesting point for the listed Hooded Plover
5. Recognition of the significant Aboriginal Heritage of the area
6. Recognition of the tourist potential of the area
7. The proposed expansion/redevelopment of the Lipson Cove camping/caravan area

The development plan also takes into consideration the actions of some members of the community who have shown complete disregard for the area of Rogers Beach through their activities of fourwheel driving or motor bike riding over the sand hills and the Aboriginal midden.

Further, the existing camping ground within the sand hill at the southern end of Rogers Beach has been a 'community practice for many years and has been allowed due to access being granted across private property by the previous owner of the land. Access is now denied as it lies within the boundary of the proposed port facility.

Access to Rogers Beach area is to be re-defined due to the new property boundaries and roadway.

The Development Plan also takes into consideration the requirement of the Pt Spencer Development Approval requirement for the creation of a 'management plan' for Rogers Beach.

THE AUDIENCE

The following listing is that of groups who have an interest in the area.

1. The community at large being identified as those within the Council District and beyond
2. The District Council of Tumby Bay
3. The Government of South Australia in relation to Crown Land and the approval of the Port, including:-

Department for Planning

Department for the Environment

Department of Transport and Infrastructure

Department for Regional Development

Department for Tourism

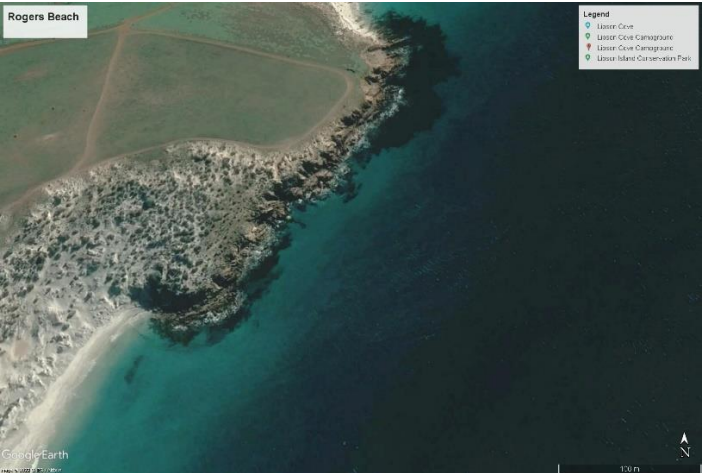
Landscape SA (Regional Board)

4. The proponents of the port development Free Eyre/Peninsula Ports
5. Regional Development Australia, Eyre Peninsula region (EPRDA)
6. University of Adelaide (Rogers Beach and Lipson Island)

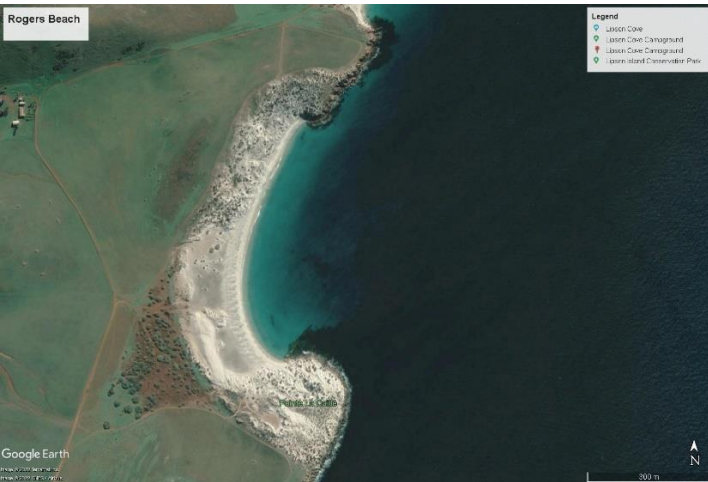
THE DEVELOPMENT PROPOSITION (DP)

For the ease of presentation, the DP has been divided into geographic zones:-

1. Rogers Beach North



2 Rogers Beach



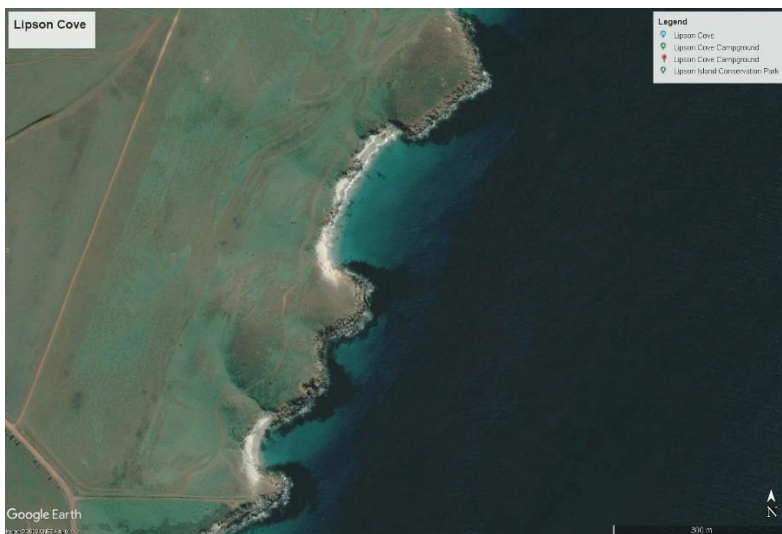
3. Rogers Beach Current Access area



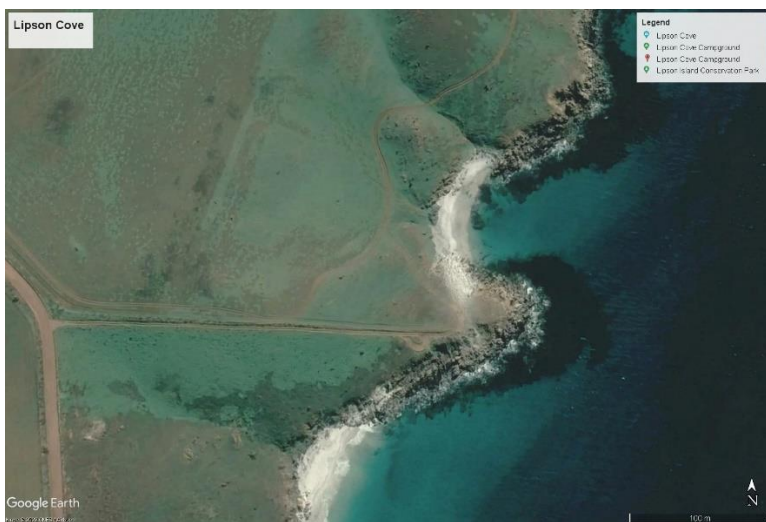
4. Observation Area South of Jetty Complex



5. Southern Walkway to jetty observation point



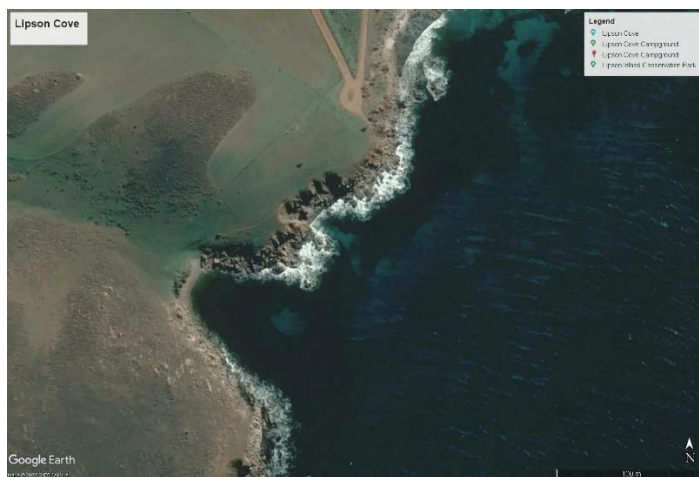
6. Lipson Cove Northern Headland



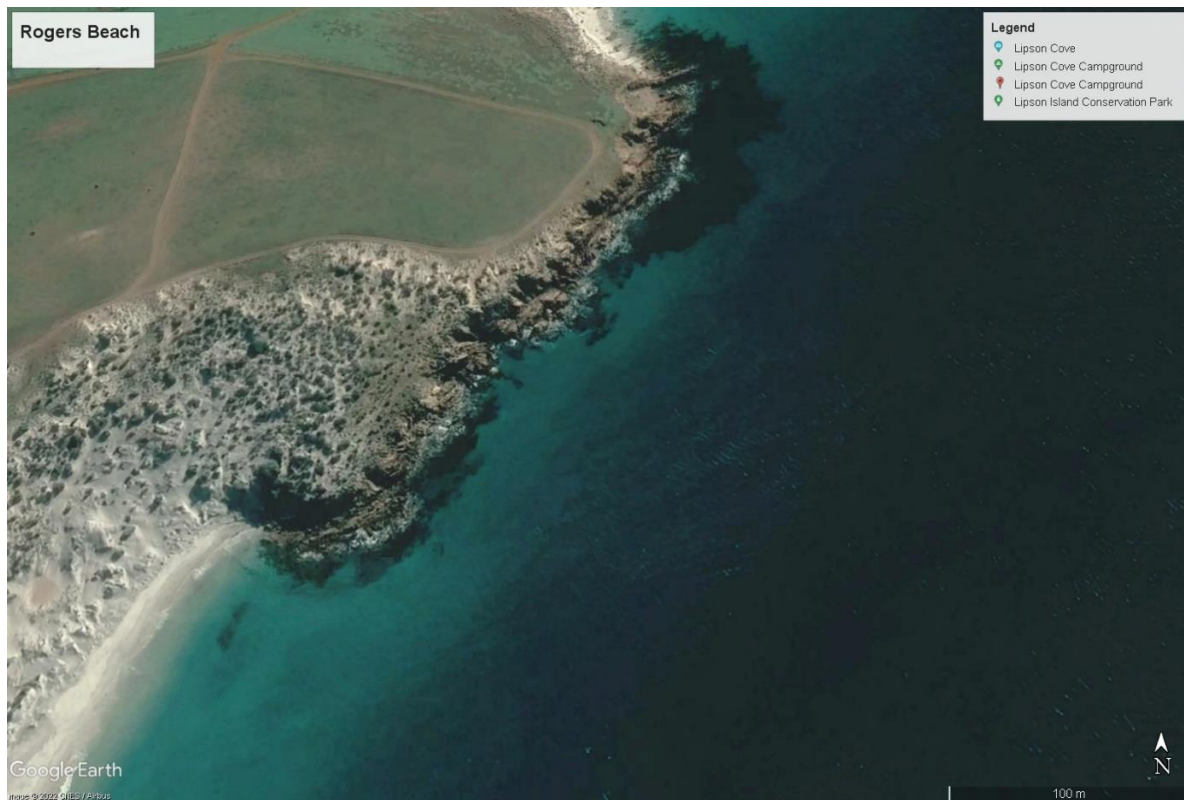
7. Lipson Cove



8. Lipson Cove Southern Walk area



1. Rogers Beach Northern Headland



The northern headland provides an elevated viewing platform providing unrestricted views of Rogers Beach and the proposed port facility.

It is noted in the Development approval for the Port, there is a requirement to provide continuous surveillance of the area to locate the presence of whales in the vicinity, in which case constriction work on the groyne/causeway/jetty is to cease due to the acoustic impact upon the whale.

It is suggested this viewing platform area would be an ideal location for such observations to be undertaken, given its unrestricted 180 degree view of the seaward area.

Access to the area:

It is suggested:

1. Access to the area is via the existing track which would need to be upgraded.
2. A suitable parking and turn around area be established as shown on image (1)
3. A dedicated pathway is created from the car park to the viewing platform image (1)
4. The location of view platform is identified on image (1)

It is suggested this be of circular area of sufficient diameter with fencing as shown

It is suggested on the northwest corner of the area an 'information centre' be erected

Subject to assessment, a pathway from the platform to the beach be considered having regard to this facility being one constructed to comply with Council's inclusive policy. It maybe that this 'pathway' is a board walk constructed to meet access requirements for persons with disability.

The Information Centre

Having regard to:

1. the areas geological history
2. the Aboriginal History (Heritage) of the area
3. the environmental significance of the area

It is suggested an information centre (shelter) be erected on the north western corner of the view area.

This facility, providing a degree of protection from the weather, would house broadsheets outlining the geological history; the Aboriginal History and the environmental significance of the area, with special reference to the habitat for listed species and plants. (similar to the facility at Tumby on the 'boardwalk'.



Image 1

2. Rogers Beach



Existing land use:

Having regard to the Aboriginal Heritage of the beach area; the environmental study just commenced in conjunction with Landscape SA; the unfortunate behaviour of some with fourwheel drive and motor cycles and the habitat for listed species, it is suggested that the actual beach area be declared an environmental conservation park and vehicular access denied.

Human foot traffic would be restricted to beach access as suggested at the northern headland.

The issue of access previously allowed would be prohibited by virtue of the secure boundary fence of the port facility.

The hitherto unmade road along the boundary fence (northern side) would then follow the existing track parallel to the beach towards the northern headland.

It is suggested that the area from the secured boundary to the northern headland be fenced with a reasonable robust cyclone fence (a) to delineate the beach from the trackway and (b) to prevent motorcycle and vehicular access to the beach.

It is assumed appropriate signage would be installed.

The suggested developments are outlined on the image below.



Proposed developments

3. Current access point to Rogers Beach



The aforementioned discussion precludes community access to the area marked by trackways in the lower right hand corner of the image.

This access point provided access across the sand dune to the beach.

Further, it provided an area for those less considerate of the environment to simply leave their rubbish.

4. Observation Area South of Jetty Complex



The observation area is located on the headland to the south of the proposed causeway/groyne/jetty complex and provides a full 180 degree view.

Access to the beach area is possible for a distance of approximately 200+metres and dependent upon the tide, another 100+metres to the base of the cliff from which the causeway protrudes.

Access to the causeway etc will be prevented due to the security fence.

5. Southern Walkway to jetty observation point



Access to the observation point is via an existing track. For the most part, walking is easy until the valley area.

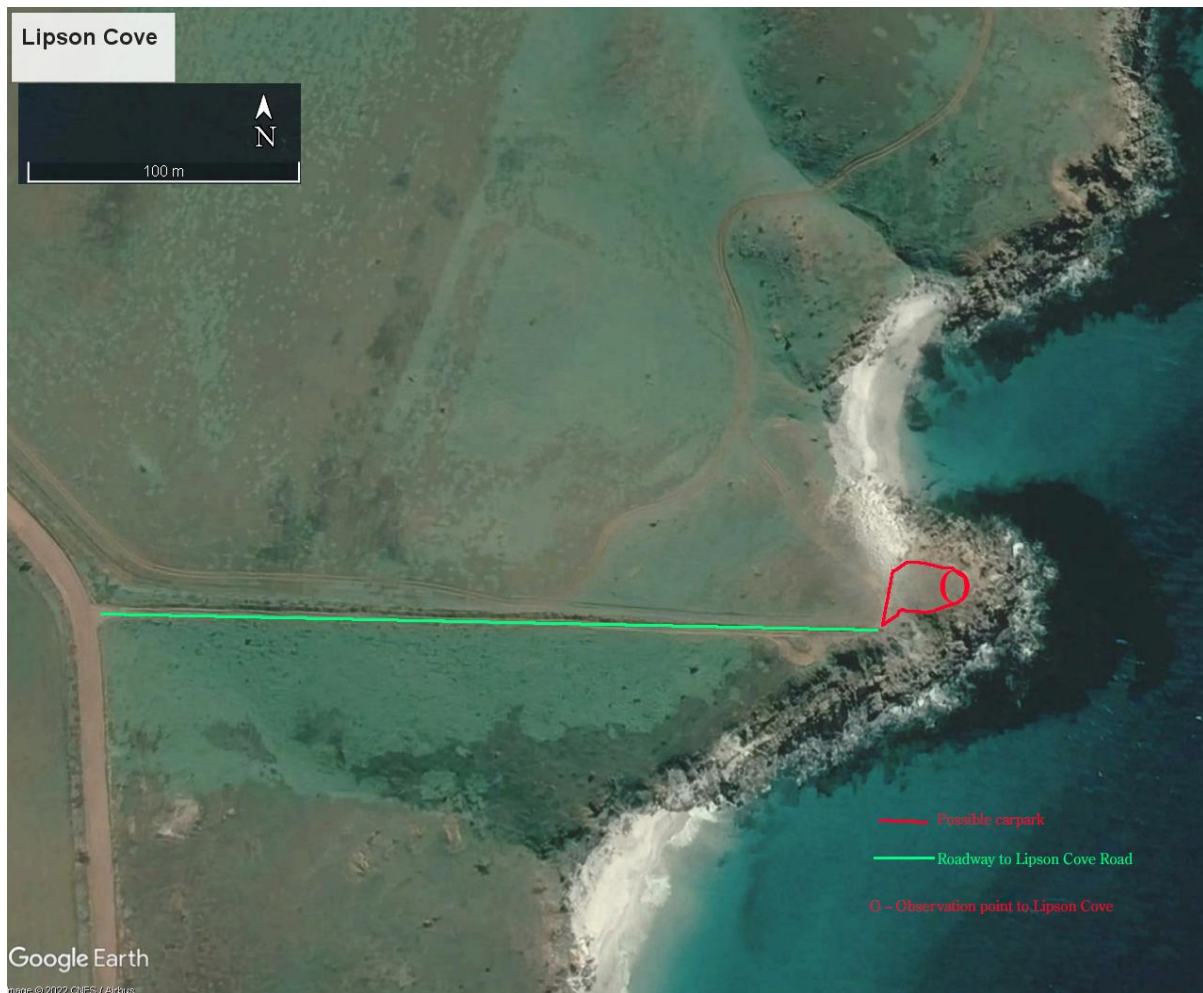
The starting point for this approximate 2 kilometre return walk is at the base of a **steep** trackway from the Lipson Cove Road terminating in a flat area at the end off the existing fence.

Care should be exercised when using this track especially in wet conditions.

For those interested in rock fishing, the water can be reach by descending the cliff face with care.

As with any rock fishing, a degree of caution is recommended due to the infrequent large waves occurring in this vicinity. It is recommended that appropriate safety harnesses/line should be used.

6. Lipson Cove Northern Headland



The headland provides an excellent photographic opportunity for the Cove and Lipson Island Marine Conservation Island.

7. Lipson Cove



The proposed upgrading of facilities for camping and caravanning is contained within the Eyes on Eyre proposal which has gone through public consultation and resides with Council and the Eyre Peninsula Regional Development Association for funding.

One of the public submissions received drew attention to the fact that any upgrading would need to ensure compliance with all legislation pertaining to persons with disabilities.

The area has been the subject of an environmental assessment undertaken when the area was freeholded where the area of the cove and the now conservation area was ceded to the Crown and the new property boundary created.

A copy of the 1988 assessment report has been made available to Council.

8. Lipson Cove Southern Walk area



The walk can be accessed at the end of the roadway on the western side of the Cove through a 'rusty gate'.

The trackway follows the cliff face to the next valley and a small cove, a distance of some 250+metres.

For the more adventurers a climb to the top of the headland to the immediate south awaits.

For those with an interest in geology, the rocks and rock formations may be of interest.

Additional Information:

Cape Spencer, Innes National Park provides an example of what can be achieved with carparking, trackways and observation point.





Rogers beach panorama



Info Centre Wudinna Granit Walks

Hon Nick Champion MP



**Government
of South Australia**

**Minister for Trade and
Investment**

**Minister for Housing and
Urban Development**

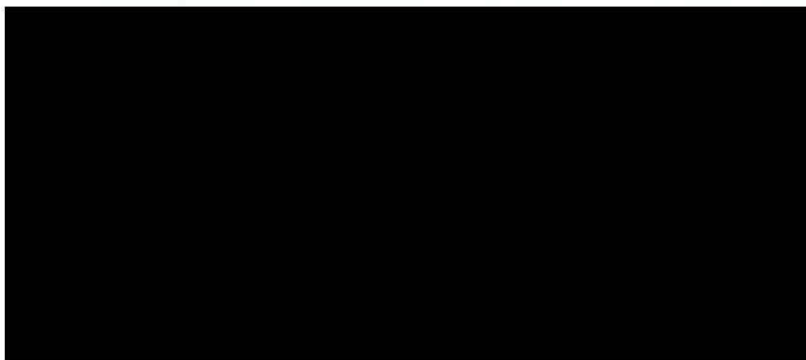
Minister for Planning

GPO Box 11032
ADELAIDE SA 5001
DX 168

T: (08) 8303 2304

E: ministerchampion@sa.gov.au

22MP04389



Thank you for your recent correspondence regarding the Port Spencer Grain Export Facility.

I note that Peninsula Ports has a valid development authorisation to undertake the project, with Stage 1 works having already been granted final approval by a previous Minister for Planning.

I have been advised by Planning and Land Use Services that the recent change to the declared project area is to accommodate a modified layout in relation to the grain bunker and truck marshalling areas. These changes (when lodged) will be considered as part of a formal amendment process to the Public Environmental Report (PER) under the *Planning, Development and Infrastructure Act 2016*.

The administrative and financial decisions of the District Council of Tumby Bay in respect to decisions and processes taken as a relevant authority under the *Local Government Act 1999* and *Roads (Opening and Closing) Act 1991* (respectively) are for its consideration and response. As Minister for Planning, I have no statutory role in these matters.

The current development authorisation requires the upgrade by Peninsula Ports of those roads directly adjacent and attributable to the port development. This includes Lipson Cove Road for heavy vehicles (which is a local council road), and the upgrade of the Lincoln Highway intersection (which is a state-controlled road).

Peninsula Ports must also prepare a Road Maintenance Fund Framework for local council roads, to be prepared in consultation with the Department for Infrastructure and Transport and the Eyre Peninsula Local Government Association.

This framework will assist in the formulation of future grant requests through the prioritisation of identified road upgrade works but does not require Peninsula Ports to fund the work themselves.



Whilst I note your concerns about the financial impacts of the proposed road upgrade works on ratepayers of the district, the further investigation of these works (both before and upon commencement of any operating grain export facility at Port Spencer) will be carefully considered by the relevant road authorities.

Thank you for taking the time to write to me about this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nick Champion', with a long, sweeping flourish extending to the right.

Hon Nick Champion MP
Minister for Planning

11 / 7 / 2022



**Government
of South Australia**

22MIT1108

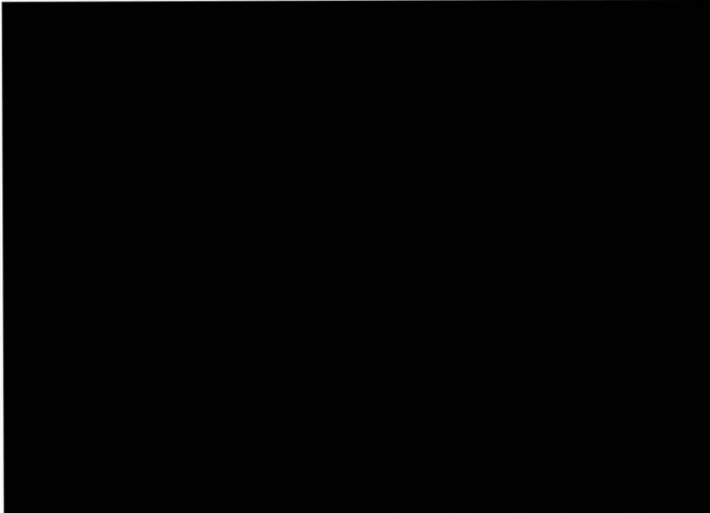
**Minister for Infrastructure
and Transport**
**Minister for Energy and
Mining**

Level 17, 25 Grenfell Street
Adelaide SA 5000

GPO Box 1533
Adelaide SA 5001

Tel 08 7133 1100

minister.koutsantonis@sa.gov.au



Thank you for your correspondence about road infrastructure and Port Spencer.

The Department for Infrastructure and Transport (the Department) advises that the question of road access to Port Spencer requires consideration of the (South Australia) *Heavy Vehicle National Law Act 2013* (The HVNL).

Heavy Vehicle access is approved by the relevant Road Manager under the HVNL, this is typically either the local council or the Department. Access is granted based on an assessment of the road, the proposed vehicle and risks to public safety and the road infrastructure.

Many local government roads on Eyre Peninsula are gazetted as commodity routes, capable of supporting local primary produce movements from the point of production to a storage or export location. Commodity routes do not provide an arterial road function for region wide commodity movements.

Decisions relating to the suitability of local government roads for the movement of large volumes of regional grain to Port Spencer rest with the relevant Road Managers.

You may be aware that the development approval for Port Spencer requires Peninsula Ports to submit a *'Road Maintenance Fund Framework for Council roads prepared in consultation with the Department of Transport and Infrastructure (sic) and the Eyre Peninsula Local Government Association'*.

The Department will be engaging with the Eyre Peninsula Local Government Association and Peninsula Ports in the near future, to progress this matter and discuss their approach to heavy vehicle access to Port Spencer.

Details of current commodity routes and general and high mass limit routes can be found on RAV Net <https://maps.sa.gov.au/ravnet/index.html>.

In regards to your query about access to Port Spencer and Swaffer Road, the Department can confirm that access will be via Lipson Cove Road. The gazettal reference to Swaffer Road was for the purposes of identifying the entirety of the development site.

In February 2019, Iron Road announced a project re-scoping which reduced output and capex requirements. Part of this change included the replacement of the proposed rail link to Cape Hardy with a haul road. Details are available at the following link <https://wcsecure.weblink.com.au/pdf/IRD/02079052.pdf>.

The Lincoln Minerals Kookaburra Gully Graphite Project was approved in 2016, however it has not progressed. Notwithstanding this, the Department reviewed the proposal in 2015 and was satisfied that the traffic impacts on the nearby arterial roads could be reasonably managed, this was subject to minor works and the implementation of a Traffic Management Plan (TMP).

It is understood that Lincoln Minerals has agreed to the implementation of a TMP. Furthermore, Lincoln Minerals has indicated that they will negotiate with the District Council of Tumby Bay appropriate maintenance requirements of the impacted portions of Pillaworta Road, and any other local roads utilised by the proposed mine operations.

In addition, the transport of dangerous goods (including rocket fuel) is managed in accordance with the *Australian Code for the Transport of Dangerous Goods by Road & Rail*. The competent authority for Road and Rail Transport in South Australia is Safework SA.

I trust this information is of assistance.

Yours sincerely



Hon Tom Koutsantonis MP
Minister for Infrastructure and Transport

19 / 9 / 2022

Port Spencer Grain Export Facility
Public submission on the Amendment to the PER

OFFICIAL



Applicant:	Peninsula Ports Pty Ltd
Nature of Development:	Port Spencer Grain Export Facility – variation to previous development authorisation - expansion of the project area boundaries to accommodate design changes to the bunker storage and truck marshalling areas, including related civil and drainage works.
Development Type:	Impact Assessed Development – amendment to the Public Environmental Report (s114 of the <i>Planning, Development and Infrastructure Act 2016</i>).
Subject Land:	Lipson Cove Road, Lipson (various parcels).
Close Date:	21 October 2022

Name	[REDACTED]
Contact Number	[REDACTED]
Email Address	
Phone Number:	
Postal Address:	

What is your interest in the proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

The proposed area is a well occupied venue for tourist & locals alike. All along the coast from Tumby Bay to Port Neill and beyond is frequented very regularly by high numbers of residence from all over the Eyre Peninsula. That area is also a significant breeding ground for many birds and other creatures; I am concerned about all the above and about the sea life and the effect having a port will have on the sea tides, the land & the environment. So No to a port

Scan and email to: spcreps@sa.gov.au

Post to: Minister for Planning
Attention: Robert Kleeman
Planning and Land Use Services – Department for Trade and Industry
GPO 1815 Adelaide SA 5000