

RESPONSE TO THE STRATEGIC IMPACT ASSESSMENT REPORT

Given the long-term nature of this project, the inherent uncertainties and the significance of the flora and fauna and conservation areas/sanctuaries, FPR would recommend

- best practice mitigation measures that go beyond standard practice for developments (See City PAE submission Reco 1)
- public visibility and accountability for the ongoing auditing, monitoring and reporting of outcomes during the construction and operation of the Osborne SCY
- best practice community engagement with stakeholders and the community
- a commitment to enhancing the local environment given that this project, with many others, promotes itself as minimally impacting elements of the environment e.g. seagrass, dolphins, while cumulatively decreasing habitat in the Port River

There are several issues of concern in the SIAR

- some risk ratings could be challenged as having a higher risk rating than nominated e.g. re migratory shorebirds, impacts of dewatering and dredging, impacts on terrestrial water and the species they support
- the apparent lack of attention to the risk to the Mutton Cove seawall and how collapse of the seawall could impact the development, the surrounding infrastructure, the local environment and the community
- additional measures needed to ensure stormwater pollutants are not entering the protected waterways (see City PAE submission)
- that public access to Mutton Cove is not unnecessarily restricted, e.g. not before nuclear submarines are in dock, or there's temporary issues re public safety such as moving transmission lines

Within the SIAR, FPR are appreciative of

- the Outcomes & Commitments Summary (Figure 35 in SIAR) established between ASA and ANI
- the commitment to Ecologically Sustainable Development
- the Compliance and reporting processes including Annual reporting and Auditing

FPR understands that to manage and store radioactive material from testing and commissioning of the power module, a purpose-built industrial facility will need to be constructed within the assembly and testing area of the Submarine Construction Yard. The SIAR (pp3-20) advises that "this facility is considered outside the scope of the Strategic Assessment and will be managed via separate environmental assessment processes and approvals as necessary".

Given high levels of community concern about the management and storage of radioactive material, and that the SCY depends on this facility if it is to build nuclear submarines, it's regrettable that this SIAR, the EIS and the environmental assessment processes for the proposed purpose-built industrial facility did not coincide. There's considerable community frustration both that radiation material will be stored and managed at the SCY and that the SIAR, and EIS, are assuming that the SCY will be built while the regime for managing and storing radiation material at the SCY is not established.

Context

The local environment is subject to significant challenges, and it is within this context that this development is occurring

- sea level rise along Port River, with City of Port Adelaide Enfield commissioning its first report into these risks in 2005,
- the Adelaide international Bird Sanctuary, Bird Island and the Torrens Island Conservation Park are prime locations for flooding under future sea level rise projections
- land subsidence occurs along the Lefevre Peninsula and Torrens Island
- a decline in the population of resident dolphins, and State measures that do not fulfil the aspirations of the *Adelaide Dolphin Sanctuary Act 2005*
- breaching of the seawall at Mutton Cove in 2016, and erosion of the inner banks, without any State Government response
- dashing of the community's hopes for a biolink, from Mutton Cove to the Gulf, by the use of Falie Reserve as access to car parking, and its proposed rezoning to Strategic Employment Zone
- climate change impacts, including heatwaves and rising sea levels, that endanger our seagrass (*Zostera*), saltmarsh and mangroves
- there is no Conservation and Restoration Plan for the Port River & Barker Inlet Estuary, and with successive developments there's increasing pressure on our natural environment

Uncertainties with the development

Together with the City of Port Adelaide Enfield, FPR are conscious that a great deal of more detailed work needs to be undertaken, and this has the potential to affect any proposed mitigation measures. Many of the recommendations made in the City of Port Adelaide Enfield's response to the SIAR propose further consultation with Council.

There are numerous issues which if they are not adequately addressed, and/or made visible and accountable, will be of concern to the community. Overcoming a deficit of trust, with both this project and State Government's environmental management, are barriers that this project can best address through respect for the local environment, best practice environmental management and effective community engagement processes.

City of Port Adelaide Enfield Submission

The Friends of Port River are supportive of the draft submissions¹ by the City of Port Adelaide Enfield to the Strategic Impact Assessment Report and the EIS.

Some of the matters FPR would highlight in Council's draft SIAR submission include:

Overview

The SIAR states that as the development of design and planning for the SCY is still in its early stages, the scope of some activities related to the development are still under consideration. This includes uncertainties that relate to the design, construction and operation of the Strategic Assessment Plan (SAP), such as the timing / duration of activities, the frequency of activities and the scale and extent of activities.

Whilst Council acknowledges this position, there is some concern that, as a result of this limitation, assessment of the potential impacts of undertaking the Actions and Classes of

¹ Draft submissions to the SIAR and EIS, City of PAE Agenda of March 11th, 2025 Items 14.2.1.1 and 14.2.1.2

Actions, may not be entirely accurate. The importance of ongoing auditing, monitoring and reporting of outcomes being delivered during the construction and operation of the Osborne SCY is therefore fundamental to the protection of matters of national environmental significance (MNES) and the environment....

The 'SMART' mitigation measures described in Table 8-1 assumes that the mitigation measures identified will be sufficient to deliver the risk ratings set out in the Environmental Risk Assessment (Table K-1). However, that is currently unknown and reinforces the importance of monitoring future compliance throughout the construction and operation of the Osborne SCY to ensure that identified mitigation measures are implemented as proposed and will result in the reductions in risk predicted....

within Table K-1 are a number of 'unmitigated risk ratings' that could be challenged as having a higher risk rating than what is given. For example, noise generation from the construction would likely have a higher risk rating than 'unlikely' for EPBC listed migratory shorebirds which are known to be very sensitive to noise and will vacate feeding and roosting location from noise disturbance. As the development site footprint and adjacent areas (particularly Bird Island, Mutton Cove and Torrens Island) contains both feeding and roosting habitat and these birds were found to be present in surveys, it would suggest some of the risk rating could be higher, allowing for more consideration of specialised mitigation measures.

Similarly, as there are limited details of the mitigation measures at this stage, Council has limited confidence that the subsequent risk assessments accurately assess the residual mitigated risk rating i.e. how can ASA state that the risk level will be low for a particular impact when the mitigation measures have not yet been detailed?

Recommendation 1

That ASA work in partnership/collaboration with Council and other stakeholders on best practice mitigation measures that go beyond standard practice for developments due to the significance of the flora and fauna and conservation areas/sanctuaries. Council also recommends ensuring that ecological expertise is sought regarding best practice mitigation measures for marine flora (particularly seagrass and saltmarsh), marine fauna and migratory shorebirds.

Aside from reinforcing the importance of the auditing, monitoring and future compliance reporting throughout the duration of the development, Council strongly encourages that the Strategic Impact Assessment Report principles of ecologically sustainable development are integrated into the design, construction and operation of the SCY.

Stormwater quality

The SIAR needs to be updated to include the necessary, industry recognised stormwater quality reduction targets that need to be met, to prevent stormwater runoff quality impacts to the Port River. Those being a reduction of: 90% gross pollutants, 80% suspended solids, 60% phosphorus, and 45% nitrogen. These should be listed as a "measurable" in the table and apply "during design" under all relevant "impact factors" relating to stormwater runoff....

Stormwater pollution reduction is of particular importance as the development site is adjacent to sensitive waterways that are protected. The Port River Estuary system is listed as a wetland of national importance (Barker Inlet and St Kilda Wetland) with additional

protection measures required under the Adelaide Dolphin Sanctuary Act, 2005. Strong consideration needs to be made to the additional measures (pollution reduction targets listed above) that are needed to ensure stormwater pollutants are not entering the protected waterways.

Clearing of Vegetation

The impacts from dredging the Port River as well as the construction of Area 3 will have significant impact on the seagrass cover within the Port River. The removal of seagrass should be included as clearing of vegetation and, as with terrestrial vegetation clearance, should aim to 'offset' or provide an improved biodiversity outcome elsewhere on the site.

Consideration should also be given to supporting local volunteer groups and NGOs who work tirelessly on monitoring and restoration projects to improve the ecological health of the Port River Estuary.

Hydrological changes

Council seeks further clarification on how the proposed development will impact local hydrology, groundwater movement, and stormwater systems.

A key concern is the increased impervious surface area, which may alter natural infiltration rates and result in higher stormwater runoff volumes. Without appropriate management, this could lead to localised flooding, increased pressure on Council's stormwater infrastructure, and reduced groundwater recharge.

Council requests details on how stormwater will be managed on-site, including the incorporation of Water Sensitive Urban Design (WSUD) principles, detention basins, and other mitigation measures.

Recommendation 10

Given the complex hydrological conditions of the area, that the Lefevre Peninsula Stormwater Management Plan be used as a key reference for understanding local topography, groundwater interactions, and flood risk assessments. This plan contains valuable data that should inform further investigations and ensure that hydrological impacts are appropriately considered in the development process.

Community engagement

Community and stakeholder consultation is addressed in Section 2.3 of the SIAR

The goal of the engagement process is to build a long-term partnership with the community and gain the community's trust and confidence. Engagement will continue throughout the construction and operational phases of the Submarine Construction Yard.

FPR would advocate for ANI and ASA to provide information and undertake engagement with the Lefevre Peninsula community. For about 4 years FPR (with Port Adelaide Residents Environment Protection Group) has met regularly and sought to engage constructively with ANI, and ASA, to share local knowledge, minimise negative environmental impacts and seek environmental benefits from the on-ground works being designed and constructed through ANI. While PAREPG and FPR cannot speak for the community, ANI and ASA's commitment to engagement, together with ANI & ASA's ongoing relationship with the City of Port Adelaide Enfield, can potentially contribute to more appropriate environmental outcomes.

Outcomes and commitments

FPR is pleased that there is an Outcomes and commitments summary (figure 35) that provides “an outline of the commitments and outcomes to be implemented for the management of Protected Matters, over the life of The Plan”. These outcomes and commitments can hopefully be demonstrated by the monitoring, evaluation, reporting and improvement, and auditing, processes proposed in Section 10 of the SIAR.

It will be welcome for our community to have public and timely access to Annual Reports for the construction of such a major facility - the Submarine Construction Yard - demonstrating how the Actions or activities undertaken for the construction of the Submarine Construction Yard are compliant with The Plan or, if non-compliant, include the measures that were undertaken to rectify, manage, or address the non-compliance.

ESD

FPR is supportive of SIAR’s commitment to principles of ecologically sustainable development being integrated into the design, construction and operation of the Submarine Construction Yard, and being included in the assessment of the likely potential impacts across different scenarios.

Lefevre Peninsula Masterplan

There’s been minimal community engagement so far in the development of the Lefevre Peninsula Masterplan and FPR hopes that going forward there will be best practice community engagement and adherence to the Commonwealth’s commitment to ‘provide disclosable information in a timely manner... and support stakeholder engagement activities’.

Potential impact on Mutton Cove

FPR concerns about the potential impact on Mutton Cove are addressed in our submission re ANI’s EIS and are reflected here.

Given the major construction proposed on the subject site, especially at the southern end, there would seem to be a substantial risk to the seawall and to Mutton Cove, its habitat and the species it supports. Before constructing major buildings next to Mutton Cove, to deal with potential climate risks, the land will need to be raised and often this process requires substantial preloading. Risks will also arise in constructing maritime and dock facilities, including excavation and dewatering. While Mutton Cove’s seawall has been breached at several points, the inner banks at Mutton Cove have not been built as seawalls and are also progressively eroding.

While FPR would recommend greater community input, FPR supports the draft City of PAE submission to the EIS, in relation to Mutton Cove and precinct development interface:

- We recommend that ANI and Department for Environment and Water work in partnership to invest not only in sea level rise infrastructure protection planning but holistically consider Mutton Cove integration with the proposed development, including environmental protection opportunities for marine flora and fauna.
- Utilising living coastal infrastructure treatments within and on the river boundary of Mutton Cove to provide opportunities for enhancing marine habitats and adapting to sea level rise.
- Seagrass, mangroves and samphire species contribute to a healthy intertidal

ecosystem in the Port River and are found at Mutton Cove. Mitigation measures to ensure no negative impact on these species and Mutton Cove as a whole-of-site need to be thoroughly considered and in consultation with knowledgeable saltmarsh experts.

- Council would appreciate updates from the early stages of planning in relation to marine habitats to allow complete transparency on this matter to help inform other community stakeholders of progress.

The SIAR's *Outcomes and Commitments Summary* indicates that ASA and ANI will

- Investigate the feasibility of controlled access to Mutton Cove within 12 months of commencing the Actions involved in the construction of the Submarine Construction Yard.
- Should the investigation determine controlled access to be feasible, develop an access permit framework and process.

From discussions with ASA and ANI any need for controlled access could arise in perhaps ten years time e.g. when nuclear submarines are in dock or in the River, or could be a temporary arrangement e.g. when new transmission lines are being constructed. It would be detrimental to the project's relationship with the local community to be limiting community access before or unless it was absolutely necessary. People access Mutton Cove for reasons including exercise, visiting the River, bird watching, dog walking, fishing, student field trips, environmental monitoring e.g. health and distribution of shrubby samphires.