Government of South Australia
Department for Energy and Mining

Consultation by the Minister

Temporary Workers Accommodation Facility – Aberdeen Oval



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Acknowledgement of Country
As guests here on Kaurna land, we acknowledge everything this department does impacts on Aboriginal country, the sea, the sky, its people and their spiritual and cultural connection which have existed since the first sunrise. Our responsibility is to share our collective knowledge, recognise a difficult history, respect the relationships made over time, and create a stronger future. We are ready to walk, learn and work together.

Date:	Comment:
14/10/2026	First published

Public consultation – Act requirements

Under section 72 of the *Hydrogen and Renewable Energy Act 2023* (the Act), the Minister must undertake public consultation on an environmental impact report (EIR), statement of environmental objectives (SEO), and a scoping report (where a scoping report has been developed). Regulation 39 of the *Hydrogen and Renewable Energy Regulations 2024* (the Regulations), set out the requirements for public consultation.

This report has been developed pursuant to regulation 39(5), which requires that copies of written submissions and responses made during the consultation by the Minister be available for inspection on the register. Note that, under regulation 39(6) the Minister may refuse to publish submissions made on grounds that the submissions are irrelevant, offensive, or on any other grounds the Minister thinks fit.

Section 73 and regulation 40 of the Act requires that an EIR, SEO, and scoping report (where developed), refer the documents to prescribed bodies for a response. The Act and Regulations do not require that submissions and responses made during the referral period are published on the register, however, these have been included in this document for transparency and completeness.

Submissions received during the public consultation and referral period and the proponent's responses are reported below in Appendix A and B.

Public consultation – Temporary Workers Accommodation Facility – Aberdeen Oval EIR and SEO

In accordance with the Act and Regulations, the **Temporary Workers Accommodation Facility – Aberdeen Oval Environmental Impact Report (EIR)** and **Statement of Environmental Objectives (SEO)** were published for public consultation and referred to relevant prescribed bodies and agencies meeting the minimum of 30 business day requirement, between 13 June 2026 and 24 July 2026.

Pursuant to regulation 39(2), a notice was published specifying a place at which a copy of the relevant report and statement could be obtained and invited written submissions in relation to these reports. The notice was published in The Advertiser (13 June 2026) and Plains Producer (10 June 2026).

The documents were provided to the following referral bodies for comment:

- Attorney Generals Department – Aboriginal Affairs and Reconciliation (AAR)

- Commissioner of Highways (DIT)
- Department for Environment and Water (DEW)
- Department of Primary Industries and Regions (PIRSA)
- Department for Housing and Urban Development (DHUD)
- Native Vegetation Council (NVC)
- DEM Mining Regulation Branch
- South Australian Country Fire Service (CFS)
- Northern and Yorke Landscape Board (NYLB)
- SA Health
- Regional Council of Goyder

Four public submissions were received pursuant to regulation 39. Responses were received from referral bodies pursuant to regulation 40 from AAR, DIT, DEW, PIRSA, DHUD, NVC, CFS and NYLB. The submissions are provided below in Appendix A.

Responses to these submissions by the proponent have been extracted from the EIR and provided in Appendix B of this report. The full versions of the EIR and SEO are available on the Hydrogen and Renewable Energy Register.

Appendix A – Submissions received

Application ID	23648477
Created	12/06/2026 8:48 AM
Modified	12/06/2026 8:56 AM

Name	m bolman
Email	bom20001@protonmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	All of it
Comments	The proposed location is not acceptable, it provides no benefit to anyone other than the owners of the project. A shanty town should be built on site at the wind farm not in Burra. The use of the Barrier Highway is also a problem, that section is poorly maintained, and has no shoulder. It is the only bicycle route between Burra and the Midnight Oil house, the increase in traffic is not acceptable without a properly constructed bicycle lane. There are currently 70 houses listed for sale on Gumtree in Burra and hundreds more in surrounding locations. If you need accommodation, buy 100 houses and house your workers in those.

Application ID	23651943
Created	12/06/2026 3:21 PM
Modified	12/06/2026 3:41 PM

Name	Graeme Crook
Organisation	Soil Cycle Biosystems
Email	graeme@interpredata.net
Which sections of the EIR and/or SEO does your feedback relate to?	SEO 1 to 10
Comments	The SEO for the Burra Temporary Workers Accommodation Facility is fundamentally about trust. Trust that land and water will be protected amenity and heritage values will be respected fire, flooding, contamination risks will be managed services will cope the community will not bear disproportionate costs for a time-limited project. Industrial hemp, particularly when used through prefabricated hemp-lime wall systems, low-toxicity fit-outs, and regionally anchored supply chains, offers a practical way to reduce the project's construction footprint, improve operational resilience, and convert a potentially contentious development into a visible example of healthier, lower-carbon regional infrastructure. Done correctly, hemp shifts the project story from temporary accommodation that adds pressure to temporary accommodation that demonstrates better building performance, cleaner materials, and genuine local long-term sustainable and valuable assets.
Attachments	Hemp Building and Senior Wellbeing.pdf, Benefits of Hemp for Construction Industry.pdf, How Industrial hemp can alleviate social and environmental concerns.pdf

The Strategic Advantages of Hemp-Based Materials for the Australian Building Industry

A Comprehensive Analysis of Performance, Sustainability, and Commercial Viability

Strategic Overview

Positioning Hemp-Based Materials in Australia's Decarbonization Mandate

The Australian Construction Sector's Pressure Points

The Australian construction industry faces increasing scrutiny and legislative pressure to align its practices with national and global climate targets. Achieving these targets requires a dual focus: reducing operational energy consumption and minimizing the substantial embodied carbon associated with conventional building materials, such as concrete, steel, and fired brick. Traditional materials often require high-temperature manufacturing processes (e.g., cement kilns) or rely on non-renewable resource extraction, contributing significantly to the nation's overall carbon footprint.

In response to this imperative, innovative bio-composite materials derived from industrial hemp (*Cannabis sativa*) are gaining traction. Industrial hemp is specifically bred to contain less than 1% tetrahydrocannabinol (THC), eliminating the psychoactive properties associated with illicit cannabis varieties, and is cultivated primarily for its fibre and seed.

The primary hemp-based material utilized in construction is Hempcrete, or hemp masonry. This is a lightweight composite material composed of the woody inner core of the hemp stem (hemp hurd or shiv), mixed with a lime-based binder and water. The resulting material provides a comprehensive solution for envelope construction.

The Holistic Value Proposition of Hempcrete

Hempcrete offers a unique, integrated performance profile that differentiates it from conventional materials. Unlike traditional assemblies that require layering multiple materials to achieve required performance—such as non-structural insulation coupled with structural mass—hempcrete simultaneously delivers structural insulation, exceptional fire resistance, acoustic dampening, and advanced moisture management within a single, monolithic material.

Hempcrete's unique benefit lies in its dynamic thermal properties. It successfully merges high thermal resistance (insulation, quantified by R-value) with thermal inertia (the ability to store heat or cool energy). Most synthetic insulators, such as fibreglass or polystyrene, lack the capacity to store energy and consequently lose energy quickly once the heat source is removed. By contrast, the thermal inertia of hempcrete ensures that buildings change temperature very slowly. This critical property stabilizes day/night temperature fluctuations, optimizing passive thermal performance and substantially reducing the reliance on active heating and cooling systems throughout the year, regardless of the specific local climate conditions. This dual functionality simplifies the wall assembly design for architects and builders while ensuring robust, high-performance envelopes across diverse Australian climate zones.

Environmental Superiority: Life Cycle Assessment (LCA) and Carbon Negativity

Hemp-based materials represent a paradigm shift in building sustainability, moving beyond merely reducing environmental impact to actively contributing to carbon mitigation, a concept verifiable through stringent Life Cycle Assessment (LCA).

Quantifying Carbon Sequestration: The Carbon Sink Effect

The fundamental environmental advantage of hempcrete stems from its ability to act as a verified carbon sink. Industrial hemp is a fast-growing crop that sequesters carbon dioxide (CO_2) at rates comparable to forests during its cultivation. This biomass-based sequestration is then locked into the building fabric for the life of the structure through the process of carbonation.

The carbon ledger for a standard cubic metre (m^3) mix of hempcrete demonstrates a net-negative status :

- CO_2 absorbed by 110 kg of hemp hurd: 202 kg
- CO_2 released by 220 kg of lime binder during production: +94
- Total net sequestration per 1 m^3 of wall built: -108kg .

The long-term carbonation of the lime binder eventually "petrifies" the hemp, forming limestone, which ensures the carbon remains sequestered for the life of the building. This verifiable carbon-sequestering status provides developers with a clear pathway to meet mandatory environmental reporting obligations and aligns perfectly with Australia's efforts to develop carbon credit markets.

Comparative Embodied Energy and Emissions Profile

An analysis of embodied energy (the energy used in mining, manufacturing, and transport of materials) highlights the profound difference between hempcrete and conventional alternatives. Life Cycle Assessment (LCA) studies confirm that hemp-based building boards exhibit lower embodied Greenhouse Gas (GHG) emissions compared to traditional interior linings like gypsum plasterboard.

In sharp contrast, conventional structural materials like concrete carry a substantial embodied carbon penalty. Energy consumption during cement production alone constitutes over 80% of concrete's total embodied carbon. Hempcrete production avoids the need for high-temperature kilns, which are necessary for firing bricks and creating cement clinker, significantly reducing its primary manufacturing emissions.

The analysis of hempcrete's production chain reveals that the embodied carbon associated with the material is primarily located in the electricity used during the post-farm stage, specifically for binder production, accounting for up to 45% of total emissions. However, the environmental performance of the material is not static. Research using an eco-efficiency framework demonstrates that integrating renewable energy sources is a critical mitigation strategy. Total replacement of public grid electricity with solar power can reduce the carbon footprint of hemp-based boards by 164% (from a carbon factor of -2.3 to -6.07 kg CO_2e) and reduce production costs by 0.4%. For Australian manufacturers, relying on the public grid risks undermining the primary environmental benefit. Strategic investment in localized green processing infrastructure is therefore essential to ensure the continued carbon-negative status and avoid misleading environmental claims.

Furthermore, the environmental benefits extend beyond carbon. Unlike construction materials that necessitate energy-intensive recycling or result in toxic landfill waste, hempcrete supports circular economy principles. Its biodegradability and low-toxicity

disposal profile ensure improved end-of-life performance, reducing recurrent embodied energy over the building's operational lifespan.

Table 1 provides a summary of the comparative environmental profiles of common Australian wall assemblies.

Table 1: Comparative Life Cycle Assessment (LCA) Summary for Wall Systems

Wall Assembly Type	Structural Role	Typical Embodied Energy (MJ/m^2)	Net Carbon Status (Per m^3)	Primary GHG Source
Hempcrete Infill (300mm)	Non-Load-Bearing	Moderate/Low	Carbon Sequestering (-108kg)	Renewable Energy for Binder Production
Cavity Clay Brick Wall	Load-Bearing	High (1,973)	Carbon Emitting	High-temperature Firing/Mining
Concrete Block Wall	Load-Bearing	High (1,276)	Carbon Emitting (8.56Mt CO_2e per house)	Cement Production (Over 80% emissions)

Exceptional Building Performance Metrics

Hempcrete provides tangible operational benefits through its exceptional thermal, fire, acoustic, and moisture performance, exceeding conventional material standards in several key areas relevant to Australian climate conditions.

Thermal Performance, Efficiency, and Inertia

Hempcrete is an outstanding insulator due to its porous structure, which effectively traps air.

Quantification of Thermal Resistance

A standard 300mm thick Hempcrete wall achieves a robust R-value ranging between 3.2 and 4.2, depending on the aggregate and sand content. For floor applications, a 200mm thick infill can achieve an R-value of 4.0. These R-values are highly competitive and are sufficient to meet energy efficiency compliance across virtually all Australian climate zones, including zones subject to extremes of heat and cold.

Operational Energy Efficiency

The dynamic thermal properties of hempcrete—its capacity for thermal inertia—are critical in Australia's variable climate. By storing heat (or cool energy) and releasing it slowly, hempcrete substantially reduces the reliance on mechanical heating and cooling systems. This superior thermal envelope performance can translate directly into homeowner savings, potentially resulting in up to 50% lower energy costs compared to homes built with traditional materials. This validates the material's long-term operational efficiency and strengthens the overall Life-Cycle Costing (LCC) argument.

Fire Safety and Bushfire Resilience (AS 3959 Compliance)

In a country where bushfires pose a significant annual risk, the fire resistance of building materials is paramount. Hempcrete is inherently fire-resistant, possessing a Class A fire

rating (an equivalent rating of A1 in Europe), confirming its superior resilience to heat and flame compared to common combustible materials like wood.

Laboratory testing confirms its protective properties; walls exposed to direct flame for over an hour exhibited only minor surface charring, with the internal temperature remaining below 100ºC —significantly below the ignition point of materials like pine wood (which ignites above 400ºC).

Furthermore, hempcrete is fully compliant with AS 3959, the Australian Standard for construction in Bushfire-Prone Areas. When constructed with a thickness of 200mm to 300mm and a 10mm lime render, the walls achieve a Bushfire Attack Level (BAL) rating of up to BAL 40. This designation confirms its suitability for use in regions facing a high risk of bushfires, where maintaining structural and thermal integrity under severe exposure is critical.

The combination of high fire resistance and exceptional thermal performance delivers an integrated resilience benefit. In extreme fire events, buildings often fail due to the intense external heat penetrating the structure. Hempcrete's integrity protects the internal structure and occupants from external heat flux for extended periods, making it a powerful differentiator in high-risk environments.

Acoustic Insulation and Mitigation of Noise Transfer

The porous and slightly rigid nature of the hempcrete composite provides effective acoustic dampening. The material is capable of absorbing sound and mitigating acoustic transfer, primarily focusing on medium and high frequencies, which are often perceived as disruptive in everyday life (e.g., traffic noise, voices, loud appliances).

Dedicated hemp soundproofing panels, derived from hemp fibre, have demonstrated the ability to reduce sound by up to 28 decibels, positioning them as highly effective natural alternatives for sound insulation. In flooring applications, the reduced density of hempcrete compared to structural concrete prevents it from transferring as much impact noise.

Moisture Management, Indoor Air Quality (IAQ), and Durability

Hempcrete is classified as a "breathable" building material because it is highly vapour permeable. This essential property allows the material to absorb and release moisture in response to changes in internal and external humidity without deteriorating. This active interaction with the living space ensures stable humidity levels, promoting a comfortable and healthy indoor environment with high indoor air quality (IAQ).

The regulation of moisture is a critical advantage, particularly in humid Australian coastal regions, as it prevents internal condensation, mitigates the risk of mould growth, and preserves the structural integrity of the internal timber framing. Furthermore, unlike many conventional materials, hempcrete does not release harmful volatile organic compounds (VOCs) into the air, making the building environment inherently healthier for occupants.

Durability is secured through the curing process, which typically takes about three months. During this time, a pozzolanic reaction occurs where the lime's calcium carbonate reacts with the silica in the hemp hurd, effectively 'pseudo-petrifying' the composite. This process ensures the long-term longevity and robustness of the material.

Table 2: Holistic Performance Advantages

Feature	Hempcrete Performance	Benefit to Occupant/Structure
Thermal Inertia	Stores and slowly releases heat/cool	Stable internal temperature; reduced reliance on mechanical HVAC systems
Fire Safety	Class A, BAL 40 achievable	Extreme bushfire resilience; mandatory acceptance in high-risk areas
Moisture Control	Highly Vapour Permeable	Prevents mould, ensures durability, protects structural frame integrity
IAQ	Does not emit VOCs; absorbs CO_2	Healthier living environment; compliance with modern biophilic standards.

Regulatory Framework and Australian Compliance

For innovative materials to gain widespread commercial acceptance, compliance with the Australian regulatory structure, specifically the National Construction Code (NCC), is paramount. Hempcrete has established clear pathways for compliance, largely through non-load-bearing structural applications and third-party certification.

Structural Classification and NCC Integration

Hempcrete's comparatively low compressive strength, which typically ranges from 0.3 to 3.5 MPa , is significantly weaker than conventional masonry (3 to 10MPa) or structural concrete (20 to 40 MPa). Consequently, hempcrete is classified as a non-load-bearing infill material.

In Australian construction practice, the material performs solely the functions of insulation, vapour management, and substrate for external and internal linings. All vertical, lateral, and racking loads must be carried by a separate, structurally compliant frame. This frame is typically a light timber structure constructed in accordance with Australian Standard AS 1684 (Residential timber framed construction), while foundations must be designed by a structural engineer to meet AS 2870 (Residential Slabs and Footings).

The structural limitation, while initially viewed as a restriction, serves as a significant regulatory advantage. By relying on established, highly regulated structural standards (AS 1684), hempcrete minimizes the risk associated with introducing a new structural component. The material integrates smoothly into existing, approved construction methods, making regulatory approval considerably more straightforward than for a novel load-bearing system.

CodeMark Certification: The Gateway to Mandatory Acceptance

For innovative building products, achieving recognition under the CodeMark Certification Scheme is the most effective pathway to full market acceptance. CodeMark is a voluntary, third-party product certification scheme managed by the Australian Building Codes Board (ABCB) that provides the industry's highest level of product assurance.

A CodeMark Certificate of Conformity provides one of the recognized options for meeting the 'evidence of suitability' requirements of the NCC. Importantly, the CodeMark mark

provides mandatory acceptance by building control authorities, a significant benefit that other forms of evidence, such as product appraisals or opinions, do not offer. This mandatory acceptance de-risks the design and construction process for specifiers, builders, and certifiers, often providing them with indemnification from legal liability related to the certified product.

Proprietary systems, such as OzHemp Tradical® Hempcrete, have successfully achieved CodeMark certification, confirming their compliance with the Building Code of Australia (BCA) and providing a certified solution for the market.

Jurisdictional Nuances and Industrial Regulation

Adoption and approval of hemp construction materials also intersect with state-level regulations. For example, industrial hemp cultivation and processing in South Australia are regulated under the *Industrial Hemp Act 2017*, requiring specific licenses for possession, cultivation, and processing.

Furthermore, while the NCC is a national code, its adoption timeline and specific provisions can be tailored by state jurisdictions. For instance, South Australia introduced a longer transitional period for some NCC 2022 provisions, particularly those related to liveable housing and increased energy efficiency standards (7-star equivalent thermal performance). Although the fundamental performance requirements of hempcrete (e.g., BAL 40 compliance) meet national standards, builders must remain aware of local building rules and variances gazetted by state ministers.

Economic Viability and Commercial Scaling

A comprehensive economic analysis of hemp construction must move beyond initial capital expenditure (CAPEX) to embrace a full Life-Cycle Costing (LCC) approach, factoring in operational savings and long-term durability.

Initial Cost Analysis and Market Constraints

Hempcrete currently faces an initial cost premium, often estimated to be approximately 20% higher than conventional building materials. This premium is largely attributed to supply chain immaturity and logistics costs associated with specialized materials.

Material supply costs for precast products vary significantly, with blocks ranging from approximately \$109/m^2 for thinner units up to \$330+/m^2 for thicker 300mm blocks. While these costs are competitive with some higher-quality brick options (which start around \$100/m^2), they are higher than basic construction alternatives. The initial cost is often exacerbated by reliance on imported hemp hurd or specialized binders, resulting in significant freight costs (e.g., imported HempBLOCKs include shipping from France).

Locally sourced hurd and Australian-developed eco-binders will significantly reduce that prices

Life-Cycle Costing (LCC) Benefits

For executives and policy makers, simple CAPEX comparisons are fundamentally misleading; the core economic justification for the initial cost premium lies in the demonstrable LCC savings. The higher initial investment is offset rapidly by substantial reductions in operational energy consumption. As noted in Section 3.1, the superior thermal performance translates into savings of up to 50% on heating and cooling bills over the building's operational life.

Furthermore, the longevity, resilience, and superior moisture management of hempcrete minimize the need for frequent repairs and maintenance, positively impacting recurrent costs across the building’s lifespan. As Australia shifts toward stricter energy efficiency

standards (such as the 7-star requirements), the cost of achieving compliance passively with hempcrete becomes increasingly favourable compared to the cost of layering complex insulation systems and specialized mechanical HVAC required by traditional, thermally inferior structures.

Economic Drivers for Scaling

The economic potential of industrial hemp extends beyond the construction site into regional value-added processing and manufacturing. Scaling the industry requires capitalizing on the high global demand for hemp seed, oil, and fibre, a market projected to exceed USD $26.6 billion.

However, current regulatory frameworks that restrict full-plant utilization create waste and consequently limit the profitability of agricultural processing, hindering the industry's ability to achieve cost parity with traditional building materials. By streamlining regulation to enable comprehensive hemp processing, Australian producers could generate diverse income streams, effectively subsidizing the cost of the hemp hurd for the construction sector and driving down the final cost of construction materials. The establishment of robust, well-regulated, and innovative local industries, following precedents set by international markets like Canada and the United States, is essential for Australia to become a competitive exporter of high-quality hemp products.

Implementation and Scaling Strategies

The speed and quality of construction are key determinants of material adoption. While hempcrete offers compelling long-term performance, current buildability constraints must be strategically addressed for mainstream integration.

Buildability and the Role of Prefabrication

Building walls using cast-in-place (in-situ) hempcrete is a low-tech process but is generally slower and more labour-intensive than many conventional construction methods. Furthermore, the in-situ application requires a long, three-month curing period for the material to achieve its full durability and moisture resistance.

The necessary commercial evolution to mitigate these time and labour constraints is the increased use of prefabricated systems, such as precast blocks (HempBLOCKs) and panelised construction. Prefabrication dramatically reduces on-site construction time and minimizes the risk associated with the lengthy on-site curing process.

In the high-wage, competitive Australian environment, the time savings achieved through prefabrication can often outweigh the material premium associated with blocks or panels. Prefabricated solutions simplify the installation process and require fewer layers of assembly than multi-layered conventional wall systems. Critically, prefabricated panels can also address local labour shortages by reducing the reliance on highly specialized workers for monolithic pours. This strategic shift transforms hempcrete from a bespoke, slower-paced material into a viable, efficient option for large-scale, rapid project delivery.

Workforce Development and Market Maturity

A significant barrier to widespread adoption is the existing knowledge gap and lack of awareness among the broader Australian construction workforce. While the skills involved in installing hempcrete focus more on careful control than complex trade specialization, dedicated training courses are required to upskill the workforce. Currently, the market often relies on specialized builders to subcontract the hempcrete component of a project.

Hemp Building and Senior Wellbeing

A Strategic Framework for South Australia's Aged Care Sector

As South Australia navigates a rapidly ageing demographic—with the population aged 65 and over projected to grow significantly as the state reaches 2 million people by 2031—the demand for high-quality, climate-resilient aged care infrastructure has never been more urgent. South Australians aged 85 and over are the cohort most likely to require residential care, and in the Adelaide Primary Health Network (PHN) region alone, 20% of those over 65 already require assistance with daily activities.

Current traditional construction methodologies often fail to address the unique physiological vulnerabilities of the aged, particularly in SA's extreme summer conditions. Hemp-lime composites (hempcrete) offer a transformative alternative. By integrating industrial hemp shiv with a natural binder, this material creates a "breathable" building envelope that directly mitigates the cardiovascular, respiratory, and cognitive stressors associated with ageing.

Thermal Resilience and Cardiovascular Protection in the SA Climate

South Australia is uniquely exposed to extreme heat events. During the 2009 Adelaide heatwave, direct heat-related hospital admissions for individuals aged 75 and over increased 14-fold. The ageing heart is less efficient at dissipating heat due to a decline in cardiac reserve and reduced vascularity.

The 26°C Safety Threshold

Clinical research identifies 26°C as a critical indoor temperature threshold for vulnerable seniors. Above this limit, older adults experience significant cardiovascular strain, including elevated heart rates and reduced blood pressure stability. Hempcrete's high thermal mass and low thermal conductivity create a "thermal fly-wheel" effect, maintaining stable indoor environments without the dehydrating or abrupt effects of mechanical air conditioning.

In South Australia, where heatwaves are increasing in frequency and intensity, hemp building provides a passive safeguard. Hemp houses utilize these properties to achieve high thermal efficiency and breathability. By stabilizing temperatures below the danger zone, hemp building reduces the risk of heat-induced ischemia and myocardial stress in seniors.

Atmospheric Health: Respiratory Protection and Moisture Regulation

Indoor air quality is a paramount concern for the 39.8% of Australians aged 65+ who report needing assistance to maintain their independence. Older lungs are highly sensitive to mould, fungi, and volatile organic compounds (VOCs) commonly found in synthetic building materials.

Natural Moisture Buffering

South Australia's coastal and temperate regions can experience humidity fluctuations that trigger respiratory distress. Hempcrete acts as a hygroscopic buffer, absorbing excess moisture and maintaining relative humidity within the optimal 40–60% range. This inhibits the growth of viruses and prevents the proliferation of mould and dust mites, which are major triggers for asthma and COPD.

This is for informational purposes only. For medical advice or a diagnosis, consult a professional.

Furthermore, the alkaline nature of the lime binder (pH12) acts as a natural biocide, ensuring an allergen-free environment without the need for toxic chemical treatments. For SA aged care providers like ACH Group or ECH, which prioritize "ageing in place," such environments support long-term respiratory health and reduce hospital readmissions.

Acoustic Innovation for Dementia and Hearing Impairment

Acoustic comfort is a critical, yet often overlooked, component of senior wellbeing. Hearing loss is strongly linked to social isolation and cognitive decline; in fact, every 10 decibels of hearing loss increases the likelihood of developing dementia by 27%.

Enhancing Speech Intelligibility

Reflective surfaces in traditional buildings create echoes that confuse hearing aid processors. Hempcrete's porous microstructure makes it an exceptional sound absorber, with hemp panels capable of absorbing 75–80% of sound energy at 1 kHz.

Dementia Care

For residents in memory care, high noise levels cause anxiety, agitation, and increased heart rates.

SA Implementation

Reducing "reverberation time" through hemp-based acoustic treatments can create the calm, predictable environments required for dementia-friendly design.

Safety and Resilience: Bushfire Protection and Non-Toxicity

Given South Australia's vulnerability to bushfires, structural safety is essential. Because the elderly may have limited mobility, they require longer evacuation windows.

Fire Resistance Levels (FRL)

Hempcrete is inherently fire-resistant, often achieving a Class A or 60/60/60 FRL. When exposed to fire, it forms a protective char layer that prevents flame spread and does not release the toxic acrid smoke that is a leading cause of fatalities in building fires. This is particularly relevant for SA developments in high-risk areas like the Adelaide Hills or the Eyre Peninsula, where some builders are already active on a small scale.

Economic Wellbeing and Operational Efficiency

Aged care in South Australia faces significant economic pressures, with Adelaide PHN reporting the highest residential care occupancy rate in the country.

Reducing Energy Poverty

Seniors on fixed incomes are highly vulnerable to "energy poverty." Hempcrete's superior insulation (achieving up to 8-star NatHERS ratings) drastically reduces the need for expensive mechanical heating and cooling. SA providers such as ACH Group are already investing in high-efficiency developments, such as their $120M Rose Park project which targets a 7.5-star energy rating. Transitioning to hemp-based materials could further enhance these sustainability goals while lowering long-term utility costs for residents.

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The SA Regulatory and Industrial Landscape

South Australia is well-positioned to lead in bio-based aged care infrastructure.

Industry Support

PIRSA manages industrial hemp licensing, and SARDI and Adelaide University conduct research into hemp varieties suitable for the local climate. The Industrial Hemp Association of SA (IHASA) actively promotes the material for building applications

Strategic Alignment

The *SA Health Climate Change and Health Framework 2025-2030* commits the state to decarbonizing the health system and building climate resilience. Hemp building aligns perfectly with these goals by sequestering approximately 150kg of CO_2 per cubic meter

Local Expertise

SA-based builders have demonstrated that hempcrete can be successfully integrated into the local architectural landscape, from urban extensions to regional homes.

Conclusions and Recommendations for SA Aged Care

Hemp building represents a shift from "shelter" to "care." To improve the wellbeing of South Australia's aged population, the following strategies are recommended:

Prioritise Passive Cooling

Utilize hempcrete's thermal lag to maintain indoor environments below , protecting residents from the cardiovascular strain of SA heatwaves.

Integrate Acoustic Standards

Adopt hemp-based acoustic treatments in memory care facilities to improve speech clarity and reduce the psychological stress of noise for residents with dementia.

Leverage Prefabrication

Utilize prefabricated hemp blocks or panels to reduce construction timelines and ensure consistent thermal performance in new aged care precincts.

Align with State Goals

Use the SA Health Regional Aged Care Strategy 2021-2025 and the Net Zero Strategy as a mandate for adopting sustainable, non-toxic materials that protect both resident health and the environment.

By adopting hemp composites, South Australian aged care can move toward a model of *Healthy Ageing* that is resilient, affordable, and fundamentally human-centric.

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The discrepancy between the increasing architectural demand for renewable materials and the slow adoption speed stems partly from persistent supply chain gaps and a lack of readily available, standardized domestic products. To accelerate market uptake, collaborative research (such as the UTS projects on green walls) and engagement among academia, government, and industry are essential to standardize production processes, inform investment decisions, and establish infrastructure. The establishment of local processing and prefabrication factories will reduce import dependency, stabilize the supply of standardized, certified panels, and facilitate rapid, cost-effective market integration.

Material Maintenance and Longevity

The durability of hempcrete necessitates specific finishing practices. To maintain the material's essential vapour permeability ("breathability") and maximize its long-term performance, internal and external finishes must also be permeable. Recommended finishes include limewash, lime/clay renders, or natural paints.

If a smooth finish, similar to plasterboard, is desired, durable and breathable alternatives such as magnesium-oxide panel sheets are recommended over standard gypsum plasterboard, which could potentially restrict essential moisture movement and negate the wall system's performance benefits.

Conclusion and Strategic Recommendations

Hemp-based materials, particularly hempcrete, offer the Australian building industry a powerful solution for simultaneously addressing climate mitigation, energy efficiency, and building resilience. The material provides a unique synthesis of high R-value insulation and thermal inertia, superior fire performance (BAL 40 compliance), excellent indoor air quality, and, most critically, a verifiable carbon-sequestering capacity of per cubic metre. While the initial capital cost remains a premium over some conventional materials, the superior Life-Cycle Costing, driven by substantial reductions in operational energy consumption (up to 50% savings), solidifies its economic rationale. Furthermore, the mandatory acceptance provided by CodeMark certification de-risks its use for specifiers and builders.

For hempcrete to transition from a niche, high-performance option to a foundational element of Australia's sustainable built environment, strategic interventions across policy, industry, and education are required.

Strategic Recommendations for Policymakers and Industry Stakeholders

1 - Prioritize Domestic Supply Chain Investment with Green Energy Integration

Policymakers must implement targeted incentives and grants to accelerate the establishment of domestic processing facilities for hemp hurd and specialized binders. Such investment must mandate the utilization of renewable energy sources (e.g., solar) in post-farm processing to secure and maximize the material's carbon-negative status, leveraging the environmental benefits as a competitive advantage.

2 - Standardize and De-risk Regulatory Pathways

Policy efforts should focus on expanding research into non-proprietary, site-mixed hempcrete formulations. These findings should be translated into standardized, NCC-acceptable Performance Solutions, thereby reducing the industry's dependence on expensive proprietary certifications and lowering compliance costs for smaller builders. The regulatory focus should continue to leverage the established structural framework standards (AS 1684) while standardizing the infill component.

3 - Reform Industrial Hemp Cultivation Regulations

Legislative frameworks must be streamlined to permit and encourage full-plant utilization (fibre, hurd, seed) within processing facilities. This will create economic efficiencies by generating multiple revenue streams that can effectively subsidize the cost of hurd for the construction market, helping to achieve cost parity with traditional materials.

4 - Invest in Workforce Development and Upskilling

Government and industry partnerships should fund and implement standardized training curricula for hemp construction techniques. This upskilling is essential to address the existing market knowledge deficit and ensure a stable, competent workforce capable of installing both in-situ and, critically, prefabricated hemp systems efficiently.

5 - Mandate Life-Cycle Costing in Public Procurement

Government and institutional procurers must adopt total LCC models for material selection, rather than focusing solely on initial CAPEX. This ensures that the verifiable long-term operational and environmental savings of hemp construction are accurately factored into investment decisions, demonstrating confidence and stabilizing market demand.

How industrial hemp can alleviate social and environmental concerns

(mapped to SEO Objectives OBJ 1-10)

Context and intent of this submission

This submission responds to the Temporary Workers Accommodation Facility – Aberdeen Oval, Burra proposal (AIL application by the Regional Council of Goyder) for a facility to accommodate ~400 workers for up to 5 years at the former Aberdeen Oval, 3 km north of the Burra centre.

The Statement of Environmental Objectives (SEO) frames the project's performance expectations across land and water protection (including Burra Creek), rehabilitation, biodiversity, heritage, service infrastructure, amenity, hazard management, visual impacts, and public health and safety. This submission explains—objective by objective—how industrial hemp (especially hemp-lime / hempcrete systems and associated regional fibre supply chains) can be used as a *practical mitigation lever* to reduce key social and environmental concerns.

This is not an argument that *hemp solves everything.* Rather, it is a proposal that hemp-based construction and procurement choices can be embedded into the project's Construction Environmental Management Plan (CEMP), Site Operation and Management Plan (SOMP) / Operational Management Plan (OMP), and Decommissioning and Rehabilitation Plan (DRP) to measurably strengthen outcomes against the SEO objectives.

OBJ 1 — No significant adverse change to landform, land and water quality on adjacent land (including Burra Creek)

Common concerns relevant to OBJ 1

Community concerns typically include erosion and sediment movement, impacts to water quality (especially in rain events), contamination (fuel/chemical spills), and ongoing site degradation.

How industrial hemp can assist

Reduced on-site construction disturbance through prefabrication

Where hemp-based wall systems are delivered as **prefabricated panels** (or modular components), the project can reduce the duration and intensity of disturbance-producing activities (extended wet trades, repeated material deliveries, prolonged site stockpiles). Shorter site programs reduce the exposure window for **dust, sediment run-off, and accidental spills**—all of which matter for protecting adjacent land and water.

Lower-toxicity material stack reduces contamination consequences

Hemp-lime systems can reduce reliance on petrochemical insulation products and some chemically intensive construction assemblies. While standard construction still requires fuels, lubricants, and plant, a "cleaner" material palette reduces the likelihood of persistent residues and reduces the downstream need for harsh remediation chemicals in the event of moisture or mould issues.

Moisture-buffering envelope reduces long-term maintenance risks

Hemp-lime walls are vapour-permeable and moisture-buffering, which can lower condensation-driven deterioration and reduce the likelihood of remedial works that generate waste, require solvents, or introduce additional coatings/sealants over time.

Suggested commitments (to embed in CEMP/SEDMP/SOMP)

Prioritise prefabricated hemp-lime wall elements where feasible to shorten the period of open site works.

Specify a low-VOC / low-toxicity materials schedule for internal linings, sealants, paints and finishes to reduce chemical loading and waste risk.

Align hemp construction staging with the SEO's sediment/erosion and stormwater controls: less time disturbed = less risk during heavy rainfall events.

OBJ 2 — Remediate and rehabilitate operational areas, where required

Common concerns relevant to OBJ 2

"Temporary" facilities sometimes become semi-permanent, or leave behind compacted ground, waste, and degraded land. The credibility of decommissioning is central to community trust.

How industrial hemp can assist

Design-for-disassembly via modular / panelised systems

Hemp-based construction is compatible with **modular** and **panelised** approaches that are easier to remove, relocate, reuse, or repurpose at end-of-life compared with more complex, composite-heavy assemblies.

Cleaner end-of-life material streams

Hemp-lime materials can reduce the proportion of difficult-to-handle petrochemical insulation and high-toxicity composites, simplifying separation and disposal pathways at decommissioning.

Suggested commitments (to embed in DRP early, not late)

Commit to a decommissioning pathway that prioritises reuse of modular/panel elements where feasible (or recycling / low-harm disposal where reuse is not feasible) or reuse of the facility for an alternative audience.

If needed, include a materials inventory in the DRP so the end-of-life waste streams are transparent and planned (supports the SEO's emphasis on segregation and licensed disposal). Establish rehabilitation criteria and auditing that demonstrate the site is returned to an agreed condition, with complaints resolved through the project's complaints register.

OBJ 3 — No clearance of native vegetation or disturbance to native fauna unless approvals are obtained

Common concerns relevant to OBJ 3

Even if the site is already disturbed, communities commonly worry about "scope creep," edge impacts, and incidental harm during construction.

How industrial hemp can assist

Reduced construction footprint and time

Prefabrication can reduce laydown area needs, reduce repeated access by multiple trades, and shorten the disturbance window—helping minimise inadvertent impacts at site edges.

Opportunity to strengthen landscaping with functional screening

Hemp does not substitute for compliance with vegetation legislation, but a hemp-led design ethos often aligns with retaining vegetated buffers and using landscaping for screening and amenity (which also supports OBJ 9).

Suggested commitments (to embed in CEMP / any F&FMP if required)

Use construction methods that minimise site footprint (panelised modules, controlled laydown zones).

Adopt strict site boundary controls and induction so no incidental works occur outside cleared/approved areas.

OBJ 4 — Minimise disturbance or interference to Aboriginal and non-Aboriginal heritage sites, objects, remains and places

Common concerns relevant to OBJ 4

Burra's heritage values are highly visible and important. Community confidence depends on respectful design, disturbance minimisation, and clear discovery protocols.

How industrial hemp can assist

Lower-vibration construction methods (via prefabrication)

Shorter, less invasive site works can reduce prolonged excavation, compaction, and heavy in-situ trades—reducing risk of accidental heritage disturbance and reducing the time the site is exposed to high-impact activities.

Aesthetic compatibility and "quiet architecture"

Hemp-lime finishes (and lime-based renders) can support subdued, non-reflective visual outcomes that sit more comfortably with heritage town character—helping avoid design choices that intensify perceived impact.

Suggested commitments (to embed in CEMP/SOMP/heritage discovery protocols)

Preference for off-site fabrication and controlled installation to reduce time-intensive, high-impact site activities.

Ensure discovery protocols and staff induction are robust and culturally informed, consistent with the SEO's expectation of heritage management planning.

OBJ 5 — Positive engagement of services with the Burra community

Common concerns relevant to OBJ 5

Communities often fear temporary worker facilities will extract value while imposing costs: pressure on services, reduced amenity, and limited local benefit.

How industrial hemp can assist

Local procurement pathway that can be seen and measured

Industrial hemp is not just a "green material"; it is a **regional supply chain opportunity** (growers, processing, manufacturing, transport, trades, testing). A local procurement strategy tied to hemp can convert the project into a demonstrator of local value creation.

A credible "economic benefit sharing" narrative
Where the operator works with Council and regional development bodies, hemp can be a practical anchor for local supplier participation rather than generic commitments.

Suggested commitments (to embed in the Economic Benefit Sharing and Engagement Strategies)

Publish a local procurement plan that identifies categories of work where regional suppliers can participate (materials, fabrication, landscaping, maintenance).

Run community information sessions focused on measurable benefits (jobs, apprenticeships, local contracts), not just project overview.

OBJ 6 — Adequate service infrastructure to meet maximum site capacity

Common concerns relevant to OBJ 6

People worry about pressure on roads, water, wastewater capacity, electricity, waste management, and emergency services.

How industrial hemp can assist

Thermal performance reduces peak electricity demand

Hemp-lime's thermal stability ("thermal lag" / "thermal flywheel") can reduce cooling loads during extreme heat periods. This does not remove the need for proper engineering and capacity planning, but it can reduce peak demand and improve resilience during grid stress.

Healthier internal environments reduce operational "spillover" pressures

If occupants sleep better and indoor environments remain stable, there may be fewer behavioural and amenity issues that translate into service calls, complaints, or conflict—an indirect but real infrastructure benefit.

Suggested commitments (to embed in OMP/SOMP and final design)

Set explicit operational targets: design for reduced peak cooling demand through passive performance, shading, and envelope selection (hemp-lime where compliant and appropriate).

Integrate envelope strategy with wastewater, water, and power planning to reduce operational volatility (peak loads, emergency generators, etc.).

OBJ 7 — Minimise disruption and disturbance to stakeholders, community and adjacent land uses

Common concerns relevant to OBJ 7

Noise, dust, lighting spill, traffic, waste handling, and general "liveability" impacts are often the core issues for nearby residents and businesses (including nearby land uses like the golf club referenced in the SEO).

How industrial hemp can assist

Shorter construction period reduces the duration of nuisance

Prefabricated hemp systems can materially reduce the length of time that high-nuisance activities occur.

Acoustic absorption reduces internal reverberation and perceived noise

Hemp-based materials are recognised in your project wellbeing documents as strong acoustic absorbers in key frequencies. Better internal acoustic comfort reduces the tendency for noise escalation in communal areas and can reduce noise spill beyond the site boundary when combined with good layout planning.

Thermal comfort reduces reliance on noisy, *ad hoc* cooling

When buildings overheat, people add portable units, fans, and open windows at night—often increasing noise and complaints. Better passive comfort reduces this cycle.

Suggested commitments (to embed in CEMP/SOMP and complaints handling)

Include hemp-led acoustic strategies in communal areas to reduce reverberation and late-night noise propagation.

Commit to conservative external lighting design (AS/NZS referenced in the SEO) and rely on internal comfort and thoughtful site planning rather than bright spill lighting for "security theatre."

Maintain a transparent complaints register with clear response timeframes and escalation pathways.

OBJ 8 — Minimise the risk of hazards for employees, workers, community and adjacent land uses

Common concerns relevant to OBJ 8

Hazards include fire, flooding, chemical storage, spill risk, and general safety of a high-occupancy facility near a town boundary.

How industrial hemp can assist

Fire-resilient envelope with reduced toxic smoke risk

Hemp-lime assemblies are widely described as fire resistant and lower in toxic smoke production compared with some petrochemical-heavy systems. For a facility with sleeping occupants, smoke toxicity and evacuation time are critical safety dimensions.

Reduced "heat stress risk" during extreme weather

Stable indoor temperatures reduce occupant risk and reduce operational stress on systems (and staff), which supports safer operations overall.

Lower chemical dependence

A materials strategy that reduces reliance on chemical fire retardants and high-VOC products can lower storage and handling risks over the project lifecycle.

Suggested commitments (to embed in HSMP/FEMP/BMP and material specs)

Specify fire-performance pathways for hemp-lime assemblies suitable for the building type and ensure certification/testing aligns with NCC compliance.

Integrate passive thermal performance targets into safety planning (heatwave operation procedures, cooling failure contingencies).

Maintain bunding/spill response consistent with SEO requirements regardless of materials; hemp is an enhancement, not a replacement.

OBJ 9 — Minimise visual impact of regulated activities

Common concerns relevant to OBJ 9

Visual change at town entry, perceived "camp" appearance, lighting spill, and compatibility with Burra's character and heritage values.

How industrial hemp can assist

Low-scale, subdued finishes

Hemp-lime and lime finishes can support muted, non-reflective surfaces that better integrate with rural/heritage contexts.

Reduced need for visually dominant mechanical systems

Better passive comfort can reduce reliance on large, noisy external plant or constant mechanical correction—supporting a calmer visual and acoustic presence.

Supports landscaping and screening strategy

Hemp doesn't replace landscaping, but a "passive-first" design approach aligns with retaining vegetation buffers and respecting setbacks—both central to visual impact control.

Suggested commitments (to embed in final design and landscaping plan)

Use materials and colours that minimise reflectivity and visual dominance, consistent with the SEO's emphasis on minimising visual impacts and maintaining landscaping.

Ensure lighting is minimised and controlled to prevent spill beyond the boundary (as the SEO specifies).

OBJ 10 — No injuries, deaths or health impacts to the public, all users and third parties that could reasonably have been prevented

Common concerns relevant to OBJ 10

Ultimately, this is about whether the facility is safe, well-managed, and resilient—particularly regarding fire, emergencies, and public health.

How industrial hemp can assist

Non-toxic indoor environments (lower VOC burden)

Hemp-lime systems and associated natural finishes can support lower VOC indoor environments compared with some conventional assemblies, improving occupant wellbeing and reducing complaints related to odours or irritation.

Resilience under stress conditions

Passive thermal stability reduces risk during heatwaves and power disruptions, which can otherwise cascade into health incidents or emergency responses.

Fire behaviour and smoke toxicity

Using wall assemblies that avoid highly toxic smoke generation supports safer evacuation and reduces injury risk.

Suggested commitments (to embed in OMP/SOMP/HSMP and certification approach)

Set indoor environmental quality (IEQ) targets (thermal stability, ventilation performance, low-toxicity materials) as operational requirements, not optional "green" features.

Ensure all hemp-based systems proposed are supported by appropriate testing/certification pathways for the specific application (NCC compliance remains paramount).

Maintain robust emergency planning and training consistent with the SEO's required management plans.

Why hemp improves both environmental outcomes and social licence

The SEO framework is fundamentally about preventing harm, protecting place, and maintaining community amenity while enabling a time-limited but high-occupancy facility. Industrial hemp can materially improve confidence in that outcome by:

Reducing construction nuisance (prefabrication, shorter on-site disturbance, fewer high-impact activities).

Reducing operational volatility (passive thermal stability, improved acoustic comfort, reduced peak energy demand).

Strengthening safety and resilience (fire performance and reduced toxic smoke risk, better heatwave resilience).

Improving decommissioning credibility (modular disassembly pathways, cleaner material inventories).

Creating visible local benefit (regional procurement and a credible circular-economy narrative rather than extractive supply chains).

Practical request (recommended condition / expectation)

If the application proceeds, a reasonable, outcomes-focused expectation would be that the proponent/operator explicitly addresses—within the CEMP/OMP/SOMP/DRP—whether and how hemp-based systems will be used to reduce nuisance, improve passive performance, reduce toxic material loads, and strengthen decommissioning and local benefit outcomes, with transparent reporting through the project's monitoring and complaints mechanisms.

Application ID
23839176

Created
22/07/2026 10:13 AM

Modified
22/07/2026 10:33 AM

Name
Robert Perry

Email
robertg.perry@icloud.com

Which sections of the EIR and/or SEO does your feedback relate to?
Environmental Impact Report

Comments
I support the proposed Temporary Workers accommodation.

I have undertaken extensive volunteer work in the area in question, with ongoing Fire Hazard maintenance, and by identifying and enouraging native plants with the establishment of a plant nursery (presently mothballed) located by the Golf Club maintenance area.

I believe the area to be a great site for caravans and camping, and believe that at the end of the project it should provide an opportunity for the appropriate rehabilitation and revegetation with a variety of local native species.

My experience in this area follows many years of work with the Burra Revegetation Group, and I enclose a copy of the Burra Creek Work Plan I prepared in 2024. The First Section (A) refers directly to the area in question, and the other sections are evidence of work undertaken by volunteers over the years.

Attachments
Burra Creek Work Plan 2024 A copy.pdf

Report on work undertaken by

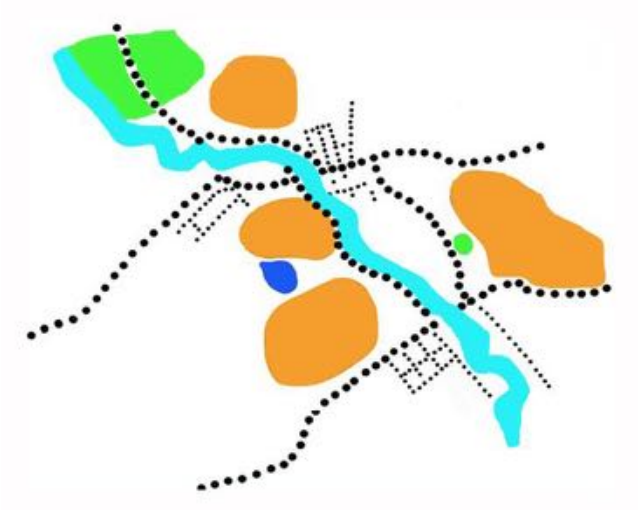
Burra Revegetation Group

in the Burra Creek

for the

Regional Council of Goyder

2012 - 2024





Regional Council of Goyder

1 Market Square, Burra South Australia, 5417
Telephone (08) 8892 0100 Facsimile (08) 8892 2467
Email: council@goyder.sa.gov.au Website: www.goyder.sa.gov.au

In reply please quote:
Ref: 2.85.1.11
JPB/mam

28th February 2012

Bruce Stockman
Chairperson
Burra Community Management Committee
PO Box 249
BURRA SA 5417

Dear Bruce,

Re: Burra Creek

Council was recently contacted by local residents expressing concern regarding Council's weed spraying practices, particularly at the Burra Creek.

This was discussed at Councils February Meeting, where it was resolved:

Council request the Burra CMC to form a sub-committee of interested volunteers to develop, and then implement, a plan for the future maintenance of the Burra Creek, Burra that addresses the issue of soil erosion, bushfire management, pest plant control and amenity as an alternative to the current Council practice of weed spraying. To assist in the implementation of the plan, Council will be considering a budget allocation in the 2012/13 financial year.

I seek your committee's views on forming this sub-committee, and would be pleased to discuss this further.

Yours sincerely

John P. Brak
CHIEF EXECUTIVE OFFICER

Summary of Events

CMC approached by Regional Council of Goyder

February 2012

Council request the Burra CMC to form a sub-committee of interested volunteers to develop, and then implement, a plan for the future maintenance of the Burra Creek, Burra that addresses the issue of soil erosion, bushfire management, pest plant control and amenity as an alternative to the current Council practice of weed spraying. To assist in the implementation of the plan, Council will be considering a budget allocation in the 2012/13 financial year.

Burra Creek Revegetation Action Plan

Prepared by EBS Ecology August 2013

Burra Community Nursery

Site selected 2014

Trees for Life

Seedlings ordered annually 2014 -2020

'Nuthin But Natives

Seedlings ordered 2021 – 2023

Activities Primarily Maintenance & Replacement

2023 - 2024

EXECUTIVE SUMMARY

The project as defined by the Regional Council of Goyder in 2012

- has basically evolved from tasks of widespread planting and maintenance to one in which the natural processes of self-seeding have reduced the need for widespread planting, and
- we are seeing indigenous local plants gradually replacing weeds and introduced species.
- the level of maintenance has reduced and is primarily mowing/slashing which should continue.
- we believe that the process has reduced the need for widespread use of herbicides in line with initial Council objectives.
- there should be ongoing assessment of the need for replacement planting, including identifying priority species.

The project has, we believe, created a natural, healthy environment which has improved the accessibility, amenity and enjoyment for local residents and visitors.

We are very keen to participate in discussions about future planning. We have established what we believe to be good working relationships with people with skills and knowledge to be of assistance.

General Opportunities

- There are a number of spaces along the creek which offer the planned introduction of interpretive signage for the heritage features the creek hosts.
- Summaries of activities and Opportunities are outlined in individual creek sections of this report
- We recommend the training of all people associated with ongoing maintenance to be familiar with the variety of plant species in the creek landscape.
- We request improved consultation and cooperation between Council staff, contractors and volunteers undertaking work within the creek reserve.

I would especially like to give recognition and thanks to those people that have participated in our activities, with special mention for Mr Bruce Stockman for his guidance, knowledge and understanding, and Maureen and Barry Wright, and Neil Matthews, and of course, the Regional Council of Goyder.

Bob Perry

Burra Revegetation Group

June 2024

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SECTION A - NURSERY TO BON ACCORD HOTEL



This is the Northernmost section of the Burra Creek included in the Project.

It flows down the valley from Mt Bryan through private land until it reaches the reserve which is on the Western side of the Burra Golf Course and the old Aberdeen Football Club and Leighton Cricket Club Oval.

It is adjacent to the Burra & Districts Dog Obedience Club and the Burra Tennis Club.

- There are several areas of interest for the Burra Revegetation Group, including areas
- which used to be part of the old Golf Club, which hosts numerous native grasses and sedges of value for the creek revegetation.
- host direct seeding and plantings by Greening Australia, as a source of seed and cuttings for future propagation

Additionally, there is an area of road reserve on the confluence of the Burra Creek from the North and one from the South West. The groundcover planted is subject to flooding.

Fairchild Park is a reserve on the bank opposite the Bon Accord Hotel.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- While it is understood this area has potential for further development, it is currently a shared resource with the Burra Golf Club maintenance area, and the and the old Clubrooms are used by both the Revegetation Group Nursery and the Golf Club
- The Burra Revegetation Group with seed and plant resources and hosts the Nursery adjacent to the Golf Club maintenance area.
- Fairchild Park could be better maintained than it is at present.


2016
2016

SECTION B - WEST OF TAYLOR STREET



One of our earliest plantings.

The area was basically just covered in weeds, so the Council contractor sprayed it, and then 'ripped and rolled' it to encourage root growth immediately before planting.

The DEWNR Community Ranger, Sam Everingham, in September 2014 worked with our Volunteers and students from the Farrell Flat and Burra Community Schools and planted over 200 seedlings - a mix of Melaleucas and Acacias, and along the edge of the Creek, some River Red Gums.

The area is maintained by the Burra Revegetation Group.

There is a yet to be completed section of the Bike Track ending adjacent to the Butterworth Mill – it was intended for it to be extended to the Railway Station and the Mine Reserve via West Street.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- Completion of the Bike Track would improve the amenity of the area.
- While maintenance will continue to be carried out, at this stage no more planting is envisaged.
- There may be an opportunity for considering amenity upgrades, given its highway frontage.


October 2012
2024

SECTION C - EAST OF TAYLOR STREET



The South side of this section was planted by Burra Community School Students in 2009 with assistance from Andy Nicholls, an NRM officer.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- The Regional Council of Goyder and more recently a Volunteer undertake some maintenance.
- The North side is mown by Council, enables impromptu off-road parking under some old pines.


October 2012
February 2016
2024

SECTION D - CROQUET CLUB CORNER



A small area between the remaining Croquet Club walls and the main road.

This area is being managed by Maureen and Barry Wright, and is planted with grasses and ground covers. It is doing well and is a rather nice entrance to the historic township of Burra.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- Beyond regular maintenance and possibly some replacement planting, nothing much needs to happen


2024

SECTION E - YOUNG ST BRIDGE TO BLACK BRIDGE



The land is awkward to manage as it is 'wedged' between the Morgan - Crystal Brook Highway and the creek bed and private property.

As with property adjacent to such roads, the design is largely about road safety, and its Eastern side consists of a substantial concrete wall to contain traffic, preventing vehicles from entering into a fight with the River Red Gums.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- There is an opportunity to consider the alternative route for the Bike Track through this area
- Creek bed maintenance needs to be considered, but the public/private boundaries need clarification.


2024


2024

SECTION F - BLACK BRIDGE TO ST JUST ST FORD



The Creek in this area has not been considered by the Burra Revegetation Group, beyond a small section by the Public Toilets where we planted groundcover saltbush. Those have now been mowed by Council staff, and replacements are not planned.

The more recently built homes on Sancreed St have meat that local residents have mowed the Eastern bank to reduce fire and other hazards.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- There are public toilets on the Western side and it all has potential for a rather nice picnic area.
- There may be opportunities for some weed removal.
- There is also potential for the adjacent Royal Exchange Hotel and other businesses to take advantage of the outlook.


2024

SECTION G 1 - ST JUST ST TO THE GROVE



This area should be seen in three parts.

1. between St Just St and The Grove
2. West side between Burra Tyres and the Mine Creek
3. East side between The Grove and Welsh Creek culvert

Planting at the Bike Path entrance on St Just Street, and along bike path, and in conjunction with Ambulance Station contractor has conducted maintenance to Burra Tyres.

This area is relatively easy to maintain, and recent upgrade to the surrounds of St Just St ford has yet to settle down.

The creek bed is inclined to be changed following floods.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- The St Just Street intersection is quite busy, and consequently maintenance is main issue.
- For safety reasons, it would be a site where native grasses and ground covers should be encouraged, perhaps using direct seeding.


2024

SECTION G 2 – WEST SIDE - BETWEEN BURRA TYRES AND THE MINE CREEK/MINE STORE



This creek bed 'pools' following rain events, at this point

The Western banks are quite precipitous- making it difficult to mow on occasions.

The understory plantings are pretty well established, and maintenance is the only ongoing requirement.

There is an infestation of weeds which needs careful attention.

The area adjacent to Burra Tyres is subject to heavy vehicle traffic.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- It is one of the most accessible sections of the creek and has potential for a visitor parking and picnic area, South of Burra Tyres, and interpretive signage would improve the relationship between Smelts Paddock, and the Buddle Pits and the Mine Store.
- It should be noted that the area opposite the Mine Store appears to have been an historic work area, with evidence of an old bridge across to the smelter.


2024

SECTION G 3 – THE GROVE TO WELSH CREEK CULVERT



The Eastern side of Creek hosts medium and understory plants adjacent to the Bike Path, and only requires maintenance.

The drain from The Crescent under the Bike Path has restricted mowing activities from that road reserve.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- The creek bed at this point has regular ‘pools’ fed by the main stream and culverts, and could be developed as an ephemeral wetland.


2024


October 2012


2024

SECTION H - MINE ENTRANCE TO MOTEL



This is area is outstanding for our project because of the challenges it provides:

1. it can be viewed easily from both sides - Market Street and the bike track to the East.
2. when the creek runs it provides a quite complicated mix of fast flowing floodwater, and expanses of water with islands created by trees and contours.

Most of the planting along the creek has happened here over a number of years and only needs regular maintenance.

The Western banks of the creek here hosted historic Dugouts, and while we have planted to reduce them collapsing/eroding, it represents quite a challenge to consider what else can be undertaken.

The Eastern banks, near the Bike Path are well developed and only require maintenance.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- Plant several shade species of trees on the ‘lawn’ area by the carpark
- Consideration could be given to a walking/bike trail above the banks on the Western side between the Motel and the Mine Entrance


February 2016
2024
2024



The Western banks North of the motel are steep and used to house Dugouts.

The woody weeds in the bed of the creek and the occasional flooding makes the lower levels difficult for growing new plants, but only require maintenance.

The two stands of English Elms appear to be being attacked by beetles.

They offer a rather pleasant ‘shady retreat’ during Summer, and have been a place where the young people from BCS and the Early Learning Centre have created play spaces.

Nevertheless, their suckering habits have invaded the creek bed for around 200 metres, from the banks of the waterbody opposite the motel then North towards the entrance to the mine.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- Some form of integrating access North of the Motel may be worth considering, given that it is currently adjacent to the upstream end of the Pickets Reserve waterbody.
- It may be appropriate to reduce the area invaded by the English Elms to improve access for maintenance and allow an improved water flow during. Flood events.


September 2016
2024
2024


North 2012
May 2024



This is a sketch of Kooringa in 1850 by W.A. Cawthorne, held in the Mitchell Library, Sydney.
It was Plate VII in Ian Auhl's 'Monster Mine' book published in1986.

It shows the location of some Dugouts in the banks of the Burra Creek adjacent to the site of the Burra Motel



SECTION J - MOTEL TO TOWN HALL FOOTBRIDGE



This area is now the site of the upgraded Skate-Park and picnic area

NB The Site photograph was taken from Google Earth in 2016


North 2016


West 2016


South 2016


East 2016

SECTION K - TOWN HALL FOOTBRIDGE TO RED BRIDGE



Pickett's Reserve, the lake, and the gardens beautifully maintained by Council and the Burra Creek Gardeners, led by Shirley Broad are a centerpiece of the Burra Creek.

The area below the Jinker, however needs to be reviewed.

We have

- stabilized the bank with a variety of saltbush and acacias.
- encouraged native species to grow on the car park bank
- attempted to reduce the number of woody weeds and suckers, and,
- appreciate the dilemma the uncontrolled reeds present.

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- At various time over the last 20 years there have been proposals to landscape the water body, add boardwalks and viewing platforms, and made submissions to the Council about the addition of access tracks for reed control, watched graders get bogged, observed young people fishing…..
- We have suggested that it would provide an excellent stage area for music events.


January 2018
2024

SECTION L - RED BRIDGE TO BOWLING CLUB



This section of the creek is a mix of beautifully maintained gardens, courtesy of the Council and the Burra Creek Gardeners on the Eastern side of the creek, and an area of closely planted native seedlings below the Gymnasium

The bank below the adjacent block is infested with 'mile a minute' succulent.

We have added some stones to the bed of the creek to encourage the retention of a small water-body, and have slashed some of the dried out reeds in the bed of the creek. Council and gardeners maintain some lawned areas and gardens

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- Continuation of low-cost improvements


2024


2024


2024


2024

SECTION M1 - BOWLING CLUB TO WEIR



Council contractors reduced the ‘out of control’ Melaleucas adjacent to the Bowling Club, and we have planted

- saltbush and smaller understory in their place, and on the bank below
- understory along the Bike Path from the footbridge to the Dugout Creek entrance.

We have also planted several species in the creek and the banks, but the area is subject to flooding and regular ‘pooling’ from road run-off water.

The weir was badly damaged in more recent floods

NB The Site photograph was taken from Google Earth in 2016

Opportunities

- The Burra Bowling Club and Council could be encouraged to use the old tennis court area for activities such as Car Boot Sales and Fairs
- Consideration being given to permanently establish a walking/bike path
- The creek bed at this point has regular ‘pools’ fed by the main-stream and culverts, and could be developed as an ephemeral wetland, and further enhanced by landscaping adjacent to the ‘Dugout’ creek..


November 2018
2024

SECTION M2 - WEIR TO PIG AND WHISTLE FORD



This is one of the nicest sections of the creek. It is overlooked from Thames Street, and has a lovely landscape along its bike path on the Eastern side

Over the years we have planted both sides of the creek apart from the rocky and steep Western Bank.

The area has been mowed regularly by Adam Jones and his father Rob.

In addition we established a (temporary) path from the Thames Street across the creek to the Bike Path to be used in a walk for the 2018 History Month

The floods in recent time have changed the nature of the creek bed.

Opportunities

- Restoration or modification to the Weir to enable safe activity in the area.
- Consideration being given to permanently establish a walking/bike path from Thames Street to the established path on the Eastern Bank.


October 2022
October 2022


October 2022
October 2022


August 2018
April 2018
2024

SECTION N - PIG AND WHISTLE FORD TO CEMETERY



Known as Mitchell Flat, this area is a mix of terrains - steep banks to the roads on Northern and Eastern side of the 'flat' on the Eastern side of the creek

The Western side of the creek has limited accessibility at this time.

The creek as it heads South towards the Cemetery has a privately owned section, and the ownership is not clear. It has is one of the only Burra creek sections which features water carved solid stone rather than clay and gravel.

We have undertaken planting of a variety of mid story and understory plants.

Maintenance is made a little difficult with a 'fight' between three weeds - convolvulus, lipea and couch in Summer. Mowing being undertaken by Libby Robinson and David ‘Jack’ Webster.

NB The Eastern bank of this site, under the road has hosted archeological digs by Flinders University.

NB The Site photograph was taken from Google Earth in 2016

Opportunities.

- In conjunction with Council, further exploration of ways the Bike/Walking path can be extended to the Burra Cemetery.


January 2015
2024
2024

Application ID
23859827

Created
24/07/2026 4:20 PM

Modified
24/07/2026 4:32 PM

Name
Russell skinner

Email
russjskinner@hotmail.com

Which sections of the EIR and/or SEO does your feedback relate to?
General observations covering both documents

Comments
There are two files, one covers my submission and the other is an Appendix.

Attachments
Submission re- Associated Infrastructure Licence Application .docx, Pettition.pdf

Submission re: Associated Infrastructure Licence Application — Aberdeen Football Oval Workers Accommodation, Burra

To: Department of Energy and Mining – Energy Regulation

I write in strong opposition to the Associated Infrastructure Licence application submitted by the Goyder Regional Council and Neoen Australia for temporary workers accommodation at the former Aberdeen Football Oval, Burra, under the Hydrogen and Renewable Energy Act 2023.

1. This infrastructure exists only to enable a project the community has not consented to

The stated purpose of this camp is to support construction of Neoen's Goyder North Wind Farm. Over 300 residents have signed a petition (Appendix 1) opposing wind towers visible from the Burra township on heritage and landscape grounds. That no one from Neoen or The Regional Council of Goyder has addressed. Approving associated infrastructure for a project of this scale, ahead of and separate from full assessment of the wind farm itself, risks entrenching the development as a fait accompli before the community's substantive objections have been properly tested.

2. Heritage and landscape impact on Burra

Burra is a state and nationally significant heritage town, and its setting — the open pastoral landscape surrounding it — is inseparable from that heritage value. A construction camp of this scale at the town's edge, servicing turbines that will be visible from the township, compounds the visual and character impact my petition addresses. This is not a neutral piece of infrastructure; it is the staging ground for the very development residents object to.

3. Council's conflicted position

The Regional Council of Goyder is a co-applicant on this AIL while simultaneously maintaining a public posture of neutrality on the wind farm itself, deferring to state planning processes rather than exercising its standing as a referral body to formally oppose the development. Co-sponsoring workers' accommodation for the project while declining to take a substantive position on the project's merits is inconsistent, and residents are entitled to know why the Council wants to be a centre for excellence for renewables without an explicit community mandate — including whether any councillors hold landholder lease agreements connected to the wind farm.

4. Regional and long-term use concerns

The notice states the camp will serve "regional needs in the longer-term" beyond the wind farm construction period. We all know what the council wants, they want to move the caravan park to this site after Neoen caravan has moved on with the benefit from councils' point of view being the infrastructure is largely established by Neoen. This is a significant undertaking that deserves scrutiny in its own right. Why not be open and upfront instead of referring to it obliquely as "regional needs in the longer term."

5. Paucity of information in the documents used to support the workers Accommodation

Far from being a genuine inquiry to address concerns, these documents by Masterplan in service of their paymaster The Regional Council of Goyder seek to downplay, distract and divert community attention. The documents represent the death of democracy by dot point. Rather than illuminate they seek to cover over issues the same way that snow falls on cedar.

Let's cover a few dot points;
The applicant is an experienced operator.

They mention this as though it's a good thing as though it is enough of a reason not to look closely at the experiences of other communities with this applicant.

This is what you will discover with just a minimal research.

Neoen Wind Farms — Communities with Recorded Objection

Operating / Under Construction

- Crystal Brook, SA — early Neoen project that faced vocal local resistance.
- Goyder South / Goyder North (Burra, SA) — Neoen's largest wind asset in Australia; Goyder North (up to 99 turbines, north of Burra and east of Mount Bryan) is going through Aboriginal Heritage Act consultation with Traditional Owners as part of its approvals process.

In Planning / Contested

- Thunderbolt Wind Farm (New England, NSW) — east of Tamworth, near Uralla. Won NSW Independent Planning Commission approval for a 192 MW wind farm after meeting strong local opposition; referred to the Commission after more than 50 objections, including from two local councils. Concerns raised included visual amenity, road impacts, water use, and impact on native vegetation.
- Bondo Wind Farm (Snowy Valleys, NSW) — near Tumut; proposed 164 turbines in state pine forest. A "No Bondo Wind Farm" petition gathered around 2,000 signatures within a month. Snowy Valleys Council passed a mayoral minute citing bushfire risk, environmental impacts, potential disturbance of naturally occurring asbestos, and visual impact on tourism, as well as broader community fatigue from the pace and scale of development. A separate residents' group, "Near Neighbours of Bondo Wind Farm," formed with over 50 people at its first meeting.
- Narrogin Wind Farm (WA) — Neoen's first WA project (200 MW). Received final approvals despite local council opposition; opponents raised concerns about noise and changes to the rural vista, with two shire councils pushing back, one alleging the developer ignored a local planning policy meant to ensure renewables projects align with community wishes.
- Tchelery Wind Farm (SW Renewable Energy Zone) — Neoen reduced turbine numbers and turbine height in response to environmental concerns and community consultation.

Compiled from RenewEconomy, The Land, Tumut and Adelong Times, and SA/WA planning documentation, July 2026.

So experienced, but not in a good way. The climate council of south Australia also had some scathing criticisms to offer;

Conservation Council SA — Submission on Goyder North Wind Farm

Proposed Goyder North Stage 1 and 2 Wind Farm Development

To: Native Vegetation Clearance Committee, Department for Environment and Water
Date: 10 March 2023
Author: Kirsty Bevan, Chief Executive, Conservation Council of South Australia

Summary

The Conservation Council SA (representing approximately 50 SA environment and conservation organisations and their 90,000 members) formally objected to the proposed Goyder North Stage 1 and Stage 2 Wind Farm, developed by Neoen. The submission raises environmental, ecological, and procedural concerns based on Neoen's own project documentation as well as independent ecological studies.

1. Destruction of Critically Endangered Ecological Communities

- The project area contains substantial remnants of the Iron-grass Temperate Natural Grasslands of South Australia (ITNG) — a nationally listed Critically Endangered ecological community under the EPBC Act.
- Only 1% of the original ITNG footprint remains in the state, far below the commonly accepted 30% minimum required for long-term ecological viability.

2. Impact on Threatened Flora and Fauna

- 12 Threatened and Vulnerable plant species are listed within the area (8 at both state and national levels).
- 30 species have endangered or vulnerable status at the state level.
- The area is a known stronghold for the endangered pygmy blue-tongue lizard (Tiliqua adelaidensis), listed under both national and state legislation.
- Figures A6.1–A6.5 in Neoen's own report show a high density of vulnerable species concentrated near main access roads, which will likely suffer the greatest impact from construction and operation.

3. Fragmentation of Habitat and Edge Effects

- The layout proposes ~70 km of 6 m-wide access roads and 40 km of cabling corridors.
- This fragments the landscape into an estimated 40+ isolated patches, increasing edge effects, dust generation, weed invasion, and predator access (foxes, cats, deer).

4. Undermining of Existing Conservation Areas

- Mokota Conservation Park — abutted on 3 sides
- Mimbara Conservation Park
- Redbanks Conservation Park
- Heritage Agreement site HA1264

5. Staging Strategy Appears Disingenuous

The current proposal covers only Stages 1 and 2, yet Stage 3 is already mapped and referenced in Neoen's documentation (e.g. Figure 4.9). Stage 3 appears to include even more significant coverage of ITNG — potentially 40–50% of that area — yet no meaningful data is presented. Conservation SA argues this staging tactic prevents holistic assessment of cumulative impacts and must be rejected as a misleading planning mechanism.

6. Clear Contradiction with Native Vegetation Principles

Traffic Management Plan Burra

(Working paper submitted 18/11/2024)

Pre-amble

The council makes no apology for the implementation of parking and traffic management controls to protect the liveability of the town in the interests of residents and rate-payers.

Issues

1. RV parking across angle parks
2. Large B double-truck movements through town
3. RV parking in residential streets
4. Queuing of long RV vehicles at local Petrol stations
5. Installation of no queuing signs on Commercial street
6. RV movements around the blocks of houses on the south side of Commercial Street either looking to park or enter the petrol stations from another angle
7. Large roadwork truck vehicles parking across angle parks overnight in the main street and on residential side streets
8. Caravans dumping grey water in the main street
9. Putting in bylaws to deal with egregious parking and dumping
10. RV vehicles doing constantly doing U-turns at residential intersections
11. Identifying appropriate areas for RV vehicles to park
12. Identifying appropriate areas for trucks to park overnight away from residential house
13. A communication strategy to RV owners transmitting to them where they can park and where not to park, via a combination of signage at the entrances to town, google searches and local FM radio
14. A timed education strategy prior to implementing fines through our own compliance officer
15. Installing planter beds on the North side of Commercial street to restrict RV access
16. Selecting an appropriate tree for Commercial street planter beds that provides shade colour and charm
17. Share with the local police to inform them of community expectations on compliance
18. The installation of clear signage such as Angle Parking Only with an RV graphic featuring the red circle with a line through it.
19. Delivery truck set down zones
20. No RV camping or parking on residential streets

It goes on the mention how its identified business and residents as important to consult, yet nothing meaningful has come from it. There's going to be a complaint register logging complaints and resolving them. How presumptuous, to assert that all complaints can be resolved. What if they are not resolved? Is the complaint process overseen by an independent third party? Will the number and nature of complaints be revealed on an annual basis. So many questions so little answers.

The document goes to list further objectives to minimise things with nothing clear about what happens if they don't. It's a gift to any developer as the loopholes are so big you could drive a truck through them. There's reference to a code of conduct, that's left to the applicant, no business or resident input. There are oblique references to economic development impact but none of it is openly discussed with input of the community.

Request

I ask that the Department:

- Refuse the AIL, or defer determination until the underlying wind farm development application has been fully assessed and community objections addressed;
- Require the Goyder Regional Council to disclose any conflicts of interest among elected members or staff connected to the wind farm; and
- Publish all submissions received, as promised, and ensure this consultation is not treated as a formality ahead of a predetermined outcome.

Russell Skinner
Burra, SA



Stop, ban, oppose and remove the wind towers that will be visible from the Burra township.

Sign Petition

change.org

Petition overview

311
supporters

6,875 petition views

111 petition shares

11 promoters

Petition strength

9 Good

Improve rating

Why this petition matters



Started by Russell Skinner

On the 13th June 2024 I made a short submission to the State Commission Assessment Panel, objecting to visibility of a dozen wind towers from the Burra township based on a photo montage provide by Neoen. I'll be appearing before the commission at Pirie Street on Wednesday 23 October 2024 to speak to my submission in person.

There is an avalanche of evidence across the nation that demonstrates the utter paucity of consultation with local communities. The Sydney Morning Herald reported on the phenomenon a few days ago on October 19, the article was titled ‘A void filled with misinformation’: The communication struggle in Australia’s renewables rollout.

Neoen more brazenly conducted a 'Void of no information session' that no one knew about on 18 October 2023. In Neon's own submission this consultation was euphemistically presented as 'lightly attended'. Where concerns about the visual impacts are still yet to be addressed in a meaningful and transparent way.

If things remain the same in the tentatively listed UNESCO World Heritage site of Burra then there's little hope for other small towns. The flip side of this coin is the removal of these towers visually from the township, which then establishes an important red-line for other small towns across the the country.

My Submission to SCAP:

I do not support the development in its current form as approximately a dozen wind towers will visible from the Burra mine lookout and other localities around the Burra township. Burra is a heritage town with a strict planning code regarding lines of sight of structures that are inconsistent with the heritage values of the Burra heritage.

Burra citizens would have great difficulty erecting a flagpole let alone a 150 metre wind turbine. There are many wind turbines being erected around Burra but they must be kept out of view from within the Burra township. Neoen’s own photo-montages contained within its submission demonstrate this will not be the case with this development application.

First update **23rd October 2024**

Thank you to everyone who has signed the petition so far.

Today I made an in-person presentation to the State Commission Assessment Panel. Neoen had four people present including Project Lead Tom Jenkins.

Regional Council of Goyder CEO David Stevenson was also in attendance. A few of the speakers spoke for others who could not attend and of the 15 or 16 presentations made, only one was in support of the Neoen Goyder North project.

Here's my 5-minute submission to SCAP.

I along with many other Burra residents oppose the very notion the that is acceptable for wind towers visible from the township of Burra.

Recently, executive's from Neoen were high on the lamb talking up expected approval while gently sidelining the objections received over the visual impact of the proposed towers, politely downplayed as normal, business as usual and nothing to see here. As though these super structures could be screened with some fast-growing scrubby bark.

Myself and others object to this corporate soft shoe shuffle.

Especially in light the corporate update on the 2025 roadmap which has only just been released. It identified 3 main goals, with goal number 2 being the stand out.

<u>Relentless execution of 2025 roadmap.</u>

Relentless execution, just let those words sink in for a moment, because it tells you all you need to know.

Translated that means, locally, we're going to whisper all the sweet nothings you want to hear, but the bottom line is we're not going to be diverted by a few schmucks running loose in a paddock in the Mid North of South Australia.

Further in the investor document, that highlights their double-digit growth, they namedrop who their real clients are when they say,

"We know which clients we want to serve."
1 Governments
2 Utilities
3 Grids
4 Corporates
5 Energy spot markets

Unsurprisingly, local communities don't get a look in.

Now I've set the context, let's turn to the visual impacts. With line-of-sight impacts being of crucial importance to new development applications and a source of a lot of rejection. One applicant has been trying rejuvenate and commercialize an old building and has had nothing but rejections accompanied by requests to resubmit with more detail.

This has been ongoing for 16 months. The latest rejection comes on fitting up solar panels to the roof. The standing joke about town is the applicant should have applied to bowl the old building over in favour of erecting a wind tower. That's because the applicants minute development proposal in comparison to a 135-tower wind farm has received more intense scrutiny than the Zapruder film.

In the 1997 I was elected to the inaugural Regional Council of Goyder; I was on the executive of the then Mid North Regional Development Board and Chair of Goyder's Economic Development Committee. Times were different then and regional development around Burra was sparse, unlike today.

We put in place some policy inducements that were very successful and attracted a company called Biada to build some Chicken Farms, one was located on hill on the approach to Burra from Adelaide. It was low rise with a low visual impact, but even then, in a pro-investment region we insisted on screening to minimise the visual impact. That is to say that even a quarter of century ago the community and the local government were cognizant of the visual impacts of unsightly structures in and around the township and sought to protect the community.

Another recollection from that time, is we travelled out to Mt Bryan to pick up a long serving councillor on the way to an event in Port Pirie, who had spent his life there and I commented how peaceful and quiet it was, he agreed and then nodded in a direction for me to look and said "And that Razorback keeps us pretty happy." In that moment I understood the depth that visual impact of landscape has on psyche.

I'm objecting to the dozen or so wind towers that will be visible to the town based on Neoen's own photomontage. Photomontages are not real they're corporate imaginings. If you're cognizant of the visual impacts which we know Neoen are then there's a temptation to gild the lily, to package in such a way that minimises what might actually be. More white cloud might be put into the sky so the towers are not so stark. The other problem with photomontages is they don't capture the movement of the blades or their velocity, meaning that the movement dimension of the visual impact is disappeared down the memory hole.

I should also mention that Burra is not suffering from NIMBYism (Not In My Back Yard). The front and back yards are very large, in that we have Wind towers present all through the region, but the community feels strongly about protecting uninterrupted views from within the township. In many ways its striking this is not a planning redline with clear protections in place where developers know not to propose such things.

Another important item not mentioned is the cumulative impact that multiple wind farms are having on the community. On the road out to Worlds End towers are erected on the ridges of the Hallelujah Hills accompanied by great scarring of the hills face to site the towers foundations and the roadway to it.

As more and more towers are erected with evermore cutting and scarring that borders on landscape vandalism, the cumulative impact to this lack of care only magnifies the community resentment to the proponents of these projects.

Neoens South Australian project leader Tom Jenkins says.

"We treasure the long-term trusted relationships that we build and which ground us in the reality of what it means, and we really enjoy being able to celebrate project milestones with the community – it is a joint effort. We also rely on communities to guide us on the best ways to share benefits from the project, and to help implement those initiatives."

These are all high-sounding words, but the social licence for the operation of these companies depends open communication, regular forums, a commitment to answering questions, such as the

paucity of funding for Burra against the rivers of gold touted, active listening and most important of all the undertaking to address community grievances. Without that trust evaporates without a trace and the high-sounding words are rendered meaningless. The only space for them to exist is in some fairy-tale, not in Real communities.

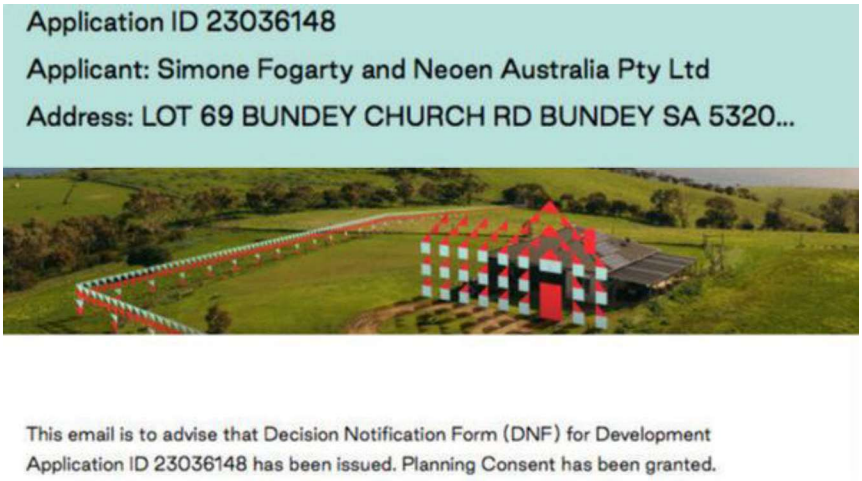
I should also mention there is an online petition against this that is gathering signatories.

I'm asking the panel to reject Neoens proposal in its current form and seek to a apply a variance to the application that absents the visually offensive wind towers from the line of sight of the township, with the offending towers to be redistributed within the field or removed altogether.

Thank you.

Russell Skinner

<u>Second update</u> **28 Oct 2024**



Unsurprising, but a disgraceful process that lacks due process.

I replied to Plan SA's email this morning.

Thank you for advising that SCAP has approved this development. An incredible outcome given the level of opposition to it and without addressing any of the concerns raised by the objectors.

It is very clear that the assessment planning process is not fit for purpose when mass opposition can be swept aside without a word addressing it. My own modest opposition to the dozen or so wind-towers visible from the township and supported by more than a 100 people on a petition started a week ago receives no mention by SCAP.

The very clear implication is that by not addressing planning grievances raised by residents, SCAP is a defacto deaf ear designed as window dressing to provide the appearance of a just and proper process. SCAP needs to be compelled to provide the reasons for ignoring the objections so the community is aware of how to marshal objections in the future.

Regards

Russell Skinner

Third Update 31 Oct 2024

Goyder North a go

JAMES SWANBOROUGH

Neoen's Goyder North project has been granted planning approval by the State Planning Commission, though it has drawn swift criticism from some corners of the local community.

The project is proposed to be located north of Burra and south-east of Hallett, on country of Ngadjuri and the First Peoples of the River Murray Mallee Region.

The project includes up to 1000MW of wind generation and up to 900MW / 3,600MWh of battery storage and will connect into ElectraNet's Bundey substation, just east of Robertstown via an overhead transmission line.

The Goyder North project joins Neoen's Goyder South project, Stage One of which is currently in advanced stages of construction, as part of its wider Goyder Renewables Zone.

Tom Jenkins, Neoen State Leader for South Australia, said the company was appreciative of the positive decision from the State Commission Assessment Panel.

"The communities in the Goyder area have been incredibly welcoming since Neoen first began developing here in 2017, and we look forward to repaying their trust as we deliver this flagship project," he said.

Yet criticism from the community has come quickly.

Russell Skinner, a former member of the Regional Council of Goyder has begun a petition to Neoen and the State Planning Commission with more than 100 signitaries opposing the development of towers.

Mr Skinner said of the 15 or 16 presentations made at the approval hearing last week, only one was in support of the Neoen Goyder North project.

"I, along with many other Burra residents oppose the very notion that it is acceptable for wind towers visible from the township of Burra," Mr Skinner stated in his submission.

Mr Skinner said while the town was not adverse to development, with many renewable projects already in place throughout the region, the cumulative impact of multiple wind farms, and direct sight-lines from the township were a step too far.

"As more and more towers are erected with evermore cutting and scarring that borders on landscape vandalism, the cumulative impact to this lack of care only magnifies the community's resentment to the proponents of these projects," he said.

Mr Skinner noted his former experience as executive of the former Mid North Regional Development Board and chairperson of Goyder's Economic Development Committee in the late 1990s.

CONTINUED PAGE 8

Wind on the rise in Burra with Neoen project

FROM PAGE 1

"We put in place some policy inducements that were very successful and attracted a company called Biada to build some Chicken Farms, one was located on a hill on the approach to Burra from Adelaide," he said.

"It was low rise with a low visual impact, but even then, in a pro-investment region we insisted on screening to minimise the visual impact ... the local government were cognisant of the visual impacts of unsightly structures in and around the township and sought to protect the community."

Mr Skinner said the imagery on display at the hearing minimised the potential visual impact of the development, and was critical of the goals of Neoen's corporate roadmap, particularly that of 'Relentless Execution'.

"Relentless execution, just let those words sink in for a moment, because it tells you all you need to know," he said.

"Translated that means, locally, we're going to whisper all the sweet nothings you want to hear, but the bottom line is we're not going to be diverted by a few schmucks running loose in a paddock in the Mid North of South Australia."

Wendy Lennon, another Burra resident in attendance at the approval hearing was particularly critical of the environmental impact, and what she perceived as Regional Council of Goyder chief executive officer David Stevenson's support of the project.

"Why should the Goyder Council CEO have any say in this?" she queried.

"He stood up and said this is what the town wants, yet there are dozens of community submissions speaking against the development. This is Burra's fight for their town and the CEO should be representing the Burra people."

Mr Stevenson said largely, the decision was on the shoulders of the State Government.

"For the most part, the Regional Council of Goyder was an observer," he said.

"We are not a decision making authority, so we have to roll with the punches to some extent, the state makes the decision because this is what they consider essential services. We have to live with the fact this approval has happened.

"This is not to say that we are against it, we certainly aren't. We have very high wind velocity.

"The geography of the place is such that if it wasn't Neoen it would be somebody else, but we are very happy to continue to work with Neoen, as they have demonstrated their acute ability to understand problems on the ground with community, do the work and be involved.

"We feel there will be some long term permanent employment coming out at the end, which helps the economy."

Mr Stevenson said a community benefit sharing agreement has been included in the development application, with details to be finalised.

"We understand the first tranche could be up to $400,000 thereabouts, subject to how many stages they feel are appropriate," he said.

"We are very keen to see some of that money go to community projects, equally the continuing conservation and preservation of the heritage of Burra and more broadly."

Regarding visual impacts, Mr Stevenson said Council made submissions to address potential conflicts with the town's tentative World Heritage listing.

"We have continued to impress upon any prospective developer, that we do not want anything which may impede the success of being inscribed," he said.

"When we first got the layout from Neoen, we noted issues with the visual impact. We then spoke to (World Heritage Consultant) Barry Gamble, and Andrew Clankey, author of our conservation management plan, spoke to our own planning team, we did a number of site visits.

"Neoen responded, and removed eight wind towers, so the impact was not as great."

Mr Stevenson noted from UNESCO's perspective, visual impact is not the same as impact to the values of the site.

"There are lots of places around the world which have this type of technology very close to World Heritage areas and places. We cannot stand still as a society and not get on with powering our society as greenly as we can."

Council has also been working with Neoen to develop a plan to house the potential incoming workforce.

"We have advanced it to the point where we have a very high level schematic," Mr Stevenson said.

"I think we all acknowledge the pressure that has come on to tourist accommodation throughout the mid north with projects across the region.



The south-western cluster of wind turbines are shown on the plan extract. WTG 6 is the turbine in closest proximity to Burra township. (Online: MasterplanSA)

"Two weeks ago I met with one of the project managers from Neoen, and she has taken the information away to do some more research from their perspective such as the definitive number of people, and when they will be working on the site so that we understand what the build might look like, and also importantly the layout, so that any legacy assets which might be left on the site are in the best possible position down the track."

Plains Producer, Wednesday, 30 October, 2024

It's not over until it's over

Today I made a submission to the EPBC Act Public Portal, reproduced below;

I am objecting to this development is based on the controlled action that this application will likely have a significant impact on the protected matter of World Heritage.

Under the Goyder South proposal Neoen stated at the State Commission Assessment Panel that 8 wind-towers had been removed from that field based on community and state-holder feedback, without adumbrating by what process or mechanism that feedback was adduced. It was only brought to my attention yesterday that it was very likely under the rubric of a protected action on World Heritage.

Currently the reasons and correspondence leading to that decision are opaque to the community of Burra. All of this correspondence and reasons behind this decision need to be disclosed to assist the

community to marshal its defence on a protected matter where a dozen or so towers will be visible from the township, according to Neoens own photo montage contained within its Development Application submission.

I have written to UK expert Barry Gamble to see if he can shed further light on the matter. I have also written to Federal environment Minister Tanya Plibersek to make the Minister directly aware on the issue of time constraints, non-disclosure and the local opposition that's building.

For more information on the issue there is a petition that is currently gaining signatories. It can be found here;

https://chng.it/ZxkBQbmzG2

Attached is the article from the front page of the Plains Produce 30th October 2024.

Fouth Update 15 Nov 2024

I'm writing to you all to raise the important issue of community consultation, as some of you may be aware from the front-page story in a recent edition of the Plains Producer, I have been very critical of Neoens claims of community consultation.

A couple of weeks ago, I started a petition opposing the proposed towers in the Goyder North field that would be visible from various locations in the Burra township. To read what I have written you can link to the Petition here.

Neoen have a document out the link is here (pages 8 to 14 are the relevant ones) that speaks to their own standards of community consultation. Reading it is a revelation as the claims are so phantasmagorical and hyped you could be forgiven for thinking you have boarded a super futuristic rocket ship to outer space.

Take an example from their values;

Commitment Mutual Benefit	– We seek shared outcomes of mutual benefit for the local host community over the long term.
Audacity Innovation	– We deliver engagement beyond regulatory conditions and compliance – We are open to and pursue bold and creative ideas and solutions tailored to and driven by the local context of the project.
Esprit de corps Relationship building	– We build and nurture long term local relationships and make meaningful links with local leaders and organisations. – We provide many avenues for interaction across the project lifecycle.

Further down at Table 3, Spectrums of engagement

In the Empower column:
Community leads the development of the renewable energy project
Place decision-making in the hands of the community

In the next row under Promise to community, again under the Empower column is this gem; *Implement what the community decides.*

If there was a scintilla of truth to these advanced ideals from the world of Star Trek, my petition would be rendered redundant and unnecessary because Neoen would already understand the hot button opposition to towers visible from the Burra township.

You know, it's akin to proposing wind-towers on the Adelaide Hills face zone when all and sundry know it's a hot button no go zone and fortunately already protected by the planning code.

So, to address this mismatch of expectations against actual actions on the ground, we need to dismiss the hype of the space-age and develop our own *Goyder Consultation Standards.* Meaning a retreat to far more terrestrial and earthly aims, which means adopting standards that;

Rise to the minimum standards of honesty

There is nothing wrong in aiming high with space age claims however without codifying them and translating the lofty claims into meaningful easily understood accessible standards, then they will remain impenetrable, unreachable and meaningless to those at the bottom, namely the community. What flows from that are the loathsome seeds of distrust and alienation.

Once the Goyder Consultation Standards are written in understandable short form English (The LGA has a framework for community consultation, it runs to 129 pages, the original American constitution runs to 4 pages of parchment) Lesson; Be careful about giving bureaucrats clear concise communication tasks as they'll pad it to the point it becomes unretainable and the core of it just disappears down the memory hole.

Then its time to present the GCS to any corporate entity that wishes to operate in the area. If they sign good, now codified standards are in place to hold them too, if they refuse then there is a very simple and powerful remedy where things remain the same structurally, but perceptually everything changes.

On November 19th at 1.00pm I'll be leading a delegation to council to have these issues ventilated and if you want to hear more on the remedy, I'll be happy to expand on it then.

I should also address the cultural phenomena of intrinsic optimism that persists in the Australian psyche. It's a strength but also a weakness. So, most Australians when representing communities do so with the best of intentions and when reading claims such as those made by Neoen its very easy to become supportive. That's where the weakness can begin.

In Australia, support is often a cigarette paper away from cheerleading and the problem with cheerleading is that you leave your critical thing skills on the pavement outside of the arena and it doesn't matter what your team does because you've crossed the Rubicon.

So yes, support and cheerlead a football team but when it comes to large billion-dollar renewable energy infrastructure development you can be a supporter so long as it's clear it's not a licence for the developer to do as they like because the first responsibility of an elected community chamber is to protect.

This principle needs to be advanced early, so while its acceptable to voice early support in the broad the detail must be contingent on meaningful and transparent community engagement and consultation where the standards for that are formally set by us and formally agreed to in writing by the developer.

There's another fallacy that occasionally gets trotted out but quickly crumbles under any cursory examination. A community member complains they haven't been consulted and an arcane view is put up that the elected members represent the community and by a feat of social osmosis all the views in the community are magically filtered and transmitted into wisdom from the few selected.

So, if you know anything about social media you know it's driven by algorithms that filter out diverse perspectives meaning everyone just ends up bathing in their preferences like a giant echo chamber that hinders the ability to think critically about different viewpoints. Elected representatives because of the human condition suffer a similar pattern of filtering bias in friendship and social networks, that's why so much has been written lately in local government circles about apprehended bias, meaning an appearance or apprehension of bias may occur if, in the circumstances, a fair-minded lay observer may reasonably apprehend that the decision maker may not bring an impartial mind to their decision.

Where large sums of money are involved, public life is a high wire act, the bigger the investment the higher the wire is hoisted and it takes focus, poise and confidence in using the balancing pole to stabilise oneself. Using this metaphor, putting in place formal policy engagement structures such as timeframe stipulated town hall meetings that are well advertised across media at the developer's expense, with motions that can be moved, recorded and implemented, is the antidote, it's the policy equivalent of putting in place automatic stabilisers.

Town halls are the big tent forums that bring in the diverse views that individuals just don't have the bandwidth to assimilate on their own. There is a place for representative committees, it's a part of organising and big tent forums can confirm or challenge their direction. The world is a chaotic and confusing place and if you're not willing to jump into the maelstrom and think, and you know, who wants to do that. You end up repeating the thoughts of others. There are plenty of thinkers out there and big forums provide a space for them. What they think is important because it can affect the thoughts of others and that's a crucial part of the democratic mosaic.

The beauty of having automatic stabilisers in place is that it frees elected members from the appearance of apprehend bias because the community is put in the primary position to navigate the way forward. It's also a clear acknowledgment of the universal value that the needs the many outweigh the needs of the few.

Regards Russell

Russell Skinner
Burra SA

Fifth Update

At the last Council meeting I led a delegation to Council to address the issue of wind towers being visible from the Burra township. If you were a reader of the Plains Producer you would have been

faithfully apprised of all the salient details of that presentation, however if your sole source of information of that meeting was the Council minutes you would have been deliberately misled and uninformed as to what actually took place by a calculated and deliberative omission.

Below is the Plains Produce report of 27 November 2024

www.plainsproducer.com.au NEWS

Call for consultation standards

JAMES SWANBOROUGH

An overflowing gallery met the Regional Council of Goyder meeting last week, as a delegation of Burra residents came to vent frustrations regarding a perceived lack of substantive community consultation on Neoen's Goyder North Windfarm development.

Following the state planning approval of the development, residents took their concerns to the council, with delegation representative Russell Skinner requesting the council move to adopt its own standards of consultation.

"I am asking that we develop our own Goyder Consultation Standards, which we then apply to any corporate entity that wishes to operate in the area," he said.

"If they sign, then good, now codified standards are in place to hold them to, if they refuse then there is a very simple and powerful remedy where things remain the same structurally, but perceptually everything changes."

Mr Skinner called for consultation to be conducted in "big tent forum" town hall meetings, whereby general community concerns can be voiced and heard broadly.

"If you conduct community consultations through committees and experts whereby none live in the township, behind closed doors and minus the big tent forums, [it shows] you don't want to be confronted with what's popular with the community and obligated to implement it, because it's unpopular to the corporate bottom line," he said.

"Once that penny drops you understand all you need to know about corporate community consultation. Real community consultation, like justice, needs to be seen to be done."

Mr Skinner asked that such a policy be codified by the council, however, chief executive officer David Stevenson said he believed the exercise may be futile.

"We are not a decision making authority," Mr Stevenson said.

"If the question is whether council would consider a new policy, the problem is it is not enforceable, because if you talk about things like wind farm developments, it is a state government matter, and the state government have their own public consultation requirements for those developments. Council could do it, but it is not enforceable."

Mr Skinner said it was a matter of public perception for the corporations in question.

"They could say no, they don't agree, but there is a very simple and powerful remedy, you write to them and say you are disappointed, you even give them 14 days to change their mind, and if they don't, withdraw the social licence to operate. For which there are consequences," Mr Skinner suggested.



Burra resident Russell Skinner has called on the Regional Council of Goyder to create a standard of community consultation when dealing with corporate investors in the region. (online)

"When there is no social licence, when they get this money, which they say they share with the community, instead of it being a 'gift,' you bill them the invoice, mark it paid, and say that is the cost of operating without a social licence.

"That is a very powerful thing. Corporations speak about social licence all the time, they recognise it. If we formally withdraw that, they've got to listen. All their documents about their magnificent consultation will evaporate unless they listen and pay attention.

"This is a very powerful lever for the council to use. Only recently there was the issue of Port Adelaide Enfield council not being consulted on the low level nuclear waste facility at Osborne.

"Those councillors voted unanimously to advocate and lobby for consultation. The exact right thing for a council to do for its community."

Mr Stevenson said the council could consider a policy framework which would require development to bring the community together for information interchange or sharing at a public forum, however, reiterated obligations would not be enforceable.

Other members of the gallery were given the chance to voice their disquiet over the conduct of NEOEN's consultation, with several voicing criticism of what they perceived to be a lack of representation from council.

Dr Barbara Piscitelli asked if council were aware that, when in consultation with individuals, NEOEN stated elected members are speaking on their behalf.

"In context, after I made a submission saying I support wind turbines and renewable energy, but I do not support having them visible from the community, I was approached by NEOEN to talk with their staff at their office," she said.

"Prior to that, there had been no significant public consultation, so I took the opportunity to go and speak to them. When I said I objected to the visibility, they said that 'Your elected members speak for you.'

"In their views, there is no need to have the 'big tent' operation. As a member of the community, I find that shocking, because I believe in democracy. So I wanted to know if you are aware of the company closing individuals out from conversation and saying the responsibility lies in your lap."

Both Mr Stevenson and Mayor Bill Gebhardt said they were unaware of this stance by the company.

"I just wanted to make you aware," Dr Piscitelli stated.

"I am a bit shocked by it," Mr Stevensons said.

Burra Community Management Committee chairperson Deb Selway said the group had a meeting with NEOEN several weeks ago, inviting them to attend a public forum to address the community.

"They declined, they did not want a public forum on the matter," Ms Selway said. "BCMC does not take a stand either way, we are a collection of individuals with diverse opinions, but we do stand for the freedom of knowing what is happening and hearing from the developer."

Mr Skinner asserted such experiences were at odds with NEOEN's own purported guidelines, which include 'seek(ing) shared outcomes of mutual benefit for the local host,' 'deliver(ing) engagement beyond regulatory conditions and compliance,' and a 'promise to community' to 'Implement what the community decides'; highlighting the importance of the council delineating their own standards.

"The beauty of having automatic policy stabilisers in place is that it ensures big tent forums with implementation guarantees will happen," Mr Skinner said.

"That frees elected members from the appearance of apprehend bias because the community is put in the primary position to navigate the way forward. It's also a clear acknowledgment of the universal value that the needs of the many outweigh the needs of the few."

Compare this to the council minutes

3. PUBLIC QUESTION TIME

Members of the public were present and the following questions were asked.

Q. Request for Council to move a motion to develop a Goyder Consultation Document that is provided to developers prior to the start of a development, the consultation would among some requirements include a general community meeting
A. [Council is not the decision-making body in relation to renewable energy developments]

Q. Is the Council aware that Neoen is telling residents that the Councillors speak on their behalf?
A. [Council was not aware of this]

Q. Why does Council not represent the local community in planning matters?
A. [Council is not the decision-making body for the renewable energy projects]

No one's name is recorded. The answer provided in the minutes to my question, is an answer to another question like, "Is the Council the decision-making body on wind farms?" My question remains unanswered. Others who raised salient and important questions like me, again were unmentioned. Yet that pales to almost nothing when realized no record exists of pertinent questions by others. They have been scrupulously scrubbed from the record by the vanishing act of omission.

One of the lead documents on the Councils website is the Customer Service Charter that seeks to stand on the soaring moral high ground and is represented pictorially by a circular feed-back loop of unbreakable perfection.

Workplace Culture

Council's commitment to best practice will be reflected in its workplace culture underpinned by inclusion, openness, dignity, respect and duty of care.



If this document had resulted in the report by the Plains Producer you could claim quite legitimately that the charter is woven into everything the Council does. Unfortunately, it produced the polar opposite. To borrow the words of the satirist Larry Davis it renders the charters claims as just a babbling brook of bullshit. What does it say about the rest of the documents? The one thing about bullshit, it runs downhill really well and leaves a stench over all it covers.

Your efforts to silence, stymie and stonewall me were not unforeseen, all you had to do was follow the bouncing ball, that's why I made the journalist James Swanborough aware of the delegation I planned to lead. The first sentence informed the group that the delegation would not be heard as it is required to write to the Mayor for permission and it's at the Mayors discretion as to whether the delegation is heard. That was the first effort to shut the show down. For anyone who is experienced in public speaking the oratorical pirouette is a minor task and it was rather easy to reframe the presentation as a question. Fortunately, public questions can't be shut down so easily.

The intransigence and obfuscation that followed from the Councils two lead spokespersons, whether they were aware of it or not, was evident in every line of their faces, every word that they uttered and every furtive glance they made to each other.

In spite of the sterling efforts, you can unbutton your collar and breathe easy, I won't be writing to seek permission to present formally, for two reasons. One, when it comes to speaking out or speaking up for community, I don't do permission, it should not be required. Two, I made all the points I wanted to make and it was reported faithfully by the talented James Swanborough to a far wider audience in the Mid North compared to the readership of the Goyder minutes. Fortunately for Council, the blocking efforts went unreported, as they just melted away to nothing under the weight of the information being transmitted.

So, within the confines of the Council chamber, you do have power. However, outside of the confines of Council or any other government body for that matter, there exists a far more potent power, and that's the superpower of public opinion. When you know how the trains of power operate and you understand how to marshal them, then anything is possible. Far from abating, this issue is building. As you contemplate the issue here's some questions to ask to help persuade yourself, only requiring yes or no answers.

1. Do Councils have a responsibility to protect?
2. Do Councils have an obligation to engage in honest community consultations?
3. If the consultation is a sham and works to shut out community voices, should those responsible be held to account?
4. Does a Community Consultative Standard meaningfully address all of the above?

During the course of the public questions a couple of diversionary whataboutery tactics were employed. The first one was 'I've got to think about 4000 people.'

My petition speaks directly to the approximately 1,100 people that reside in the township of Burra who want their voice heard on the visibility of wind towers from the township. As to the other 2,900, if a Community Consultation Standard is adopted along the lines I have suggested, then there's no downside, it's all upside, guaranteeing those people a voice on important issues that affect them.
If you're serious about thinking about the community you represent and what they want, then you have to engage with people in evidentiary ways. Incidentally, having a beer with Duncan, because Duncan's your mate, no matter how enjoyable that may be, is not evidentiary.

The other corker was, "We're not the decision-making body." Fabulous, we can all go home and go to sleep. Except for one pertinent exception. At the World Heritage Journey, No. 1 (Note the no problems with the big tent forums when the community is onside). There the local sub branch of the National Trust was under suspension for spurious reasons.

I took on the Trust's CEO directly and then, marshalled public opinion and wrote to the SA Board of Councillors (reprinted below) after the Trusts CEO skirted a meeting with Regional Council of Goyder. In a matter of weeks, he was gone. The council played an honourable role on this issue even though they were not the decision-making body in relation to the Trust CEO's employment. There was no collective shrug with a wide eyed nothing to do with us expression. The responsibility to protect was well understood and acted upon.

The subtext of this "We're not the decision-making body" is it implies the Council is Swiss on all of this. Except it's a falsehood. The CEO was down at the SCAP hearing cheerleading for it, in total support of

Neoen, against the wishes of the vast majority on the community that was against it. That's straight unvarnished duplicity.

I also directly addressed this issue during my presentation. I mentioned that the Port Adelaide Enfield Council were not the decision-making body on the proposed nuclear waste facility, that didn't stop them from unanimously speaking up for their community to demand they be consulted. They didn't try to downplay or understate their power or responsibility by claiming, "We're not the decision-making body." Not only is it up there with the biggest understatement since Noah said, "It looks like rain." It's a complete cop-out. In the end its you as the council that decide these things.

The CEO's salary, position title, prestige, authority and a large part of his identity, are all drawn from the well-spring of this community. His responsibility is to serve and protect the interests of this community, not the interests of some corporate vandal. Your responsibility is to Instruct the CEO to start representing this community not Neoen, and if there's any push back or nonsense then you replace him with someone who will. You can't have the tail wagging the dog.

People disagree on all sorts of things and the more power you possess over a decision the greater the responsibility there is to explain it. When it comes to big decisions it's important that they be determined within a framework of consistent principles. If something goes wrong you institute the corrective, usually requiring some shame, humility and grace, but above all, it's about having the vulnerability to let it all in. If you're not vulnerable you can't grow as an individual, let alone as an organisation.

Speaking of which the LGBTQ community because of their experience, possess these qualities in spades. I raise this as another terrible decision was made recently to deny the LGBTQ community their request to fly their flag for the for a short period after the Pride event, even though it was still within the timeframe of the event calendar. What staggered me most is that this decision was brought to the chamber at all, when it should have been hived off under a delegated authority.

You have a very good and thoughtful person in the role of Community Engagement Director. Set the policy parameters on events requiring guidelines of diversity, equality and equity and being consistent with contemporary values. Under that scenario I strongly suspect the request being acceded to. It avoids angst, accusations of bias and bigotry plus it frees up time for other things.

Bias can work the other way; in that it can help to make the right decisions but for the wrong reasons. Imagine with the above request there's news that a few days after the Pride Picnic, a restored Priscilla Queen of the Desert bus was to be driven from Broken Hill to Burra and to celebrate Terrance Stamp would be present in Burra for its arrival.

"Oh, of course you can fly the flag! We're modern and progressive and welcome diversity here." Especially when you can bathe in the ephemeral aura of celebrity. So, too late to put the hurt back in the bottle but not too late to delegate the decision for next year. Given this has happened in other regional areas I have written to the state Attorney General Kyam Maher about it because he's looking to act on it and its tightly tied into the issue of apprehended bias.

Finally, there was a report in the Guardian on the 10th December. It commences by speaking to the rollout of renewables being hijacked by the pro-nuclear network. If you go further into the article it addresses the growing backlash of communities at the lack of consultation on Wind Farms and other renewable energy projects. Non-aligned political groups are forming in reaction because they want control and influence in managing their local environment and strongly object to being patted on the

head with tokenism. The federal Minister for Climate Change and Energy Chris Bowen is implementing a community engagement review in the renewable sector. I have written to the Minister outlining that Burra is another model of what's gone wrong and what not to do in the community consultation space.

Good well-meaning people make bad decision's all of the time, for various and often different reasons, that's just life. Most of us just let it go through to the keeper, but on the big decisions that affect communities, people can't just wave it through. Changing course is not as hard as it might appear, it's as easy as changing the conversation. I urge you to get in front of the issue, call a public meeting so people can ventilate their thoughts and feelings on the issue of wind towers being visible from within the township. As you contemplate the issue over the coming weeks, should you firm against the idea of calling for a public meeting, then I'll call one. Much better if you do it of course, as it demonstrates you're listening and open to hearing community views on the topic.

Regards Russell

Russell Skinner
Burra SA

To; The Council of the National Trust South Australia

7th October 2022

Mr Paul Leadbeter, President
Ms Millie Nicholls, Vice President
Mr Tully Brookes, Councillor
Ms Elaine B Davies LFRAIA, Councillor
Prof Norman Etherington AM, Councillor
Ms Alice Fitch. Councillor
James Harvey, Councillor
Ms Gabrielle Iwanow, Councillor
Mr Steve Larkins, OAM, MBA, FAICD, Councillor
Mrs Caren Martin, Councillor
Ms Alison Stillwell OAM, Councillor
Di Wilkins, Councillor

Dear Councillors

I'm writing to you over the recent suspension of the Burra Chapter of the National Trust due to alleged governance issues. "Governance" is a broad non-specific term that implies all sorts of nefarious activities like incompetence, constitutional malfeasance, serious financial fraud or misappropriation. You don't have to be Einstein to realise how offensive and upsetting the action of suspension and the attached inferences would be to a long-term volunteer group acting in good faith.

On the flip side of the coin, the community cannot discount that a straight smear has taken place with the term of "governance issues" being employed as a camouflage for other purposes, like a power grab to control the significant funds coming in via the passport sales.

On the evening of 20 September, I attended a Burra Town Hall event to update the community on the UNESCO World Heritage bid. When the questions started to come, there was some polite dancing around the suspension issue. In the interest of clarity, I put forth the following:

> *"I've been informed that the Burra branch of the National Trust has been suspended and that the Moonta branch has been sacked or dismissed. Is it true and, if so, given the world heritage bids in train, what's going on?"*

Your CEO asked me if I was a Trust member (I'm not), and then proceeded to tell me it was not my business and assured me in regard to Moonta that was categorically not the case, leading us to believe there was fully-functioning branch in Moonta. I thanked him for clearing that up. I have since learned there is no branch at Moonta, but there is a paid Co-ordinator in place as in Burra. Personally, it's not my business. However, I was asking a community question in an open forum where the panel had not long before described how this community, through Council (RCOG), owns half of the assets.

Earlier that day, the Regional Council of Goyder (you know, that body that owns half the assets) invited the Trust's Chief Executive to specifically address "what are the governance issues concerning the suspension of the local committee", to the following month's meeting of Council. Even though he was in Burra for two days prior attending a mining conference, given the opportunity to account, explain and justify the extraordinary intervention taken, he folded like a cheap tent and went to ground.

The current model of having a local Co-ordinator in place of a committee means the employees would do well to reflect the views of the master less they don't have a job anymore. This may be good for the master, but it robs the community of legitimate community-based input, while depriving the Trust of any community license for its actions. The National Trust has a long history of involvement in the heritage town of Burra. Its record and name and meaning are bigger than any individual.

It's clear the relationship has broken down. The technical term for it is a breach of mutuality, meaning one party has aggrieved the other party so much there is no basis for a continuation. The great shame of it all is it didn't have to be like this. If there are legitimate concerns, the steps, after explaining the concerns to those affected, are administrative measures with enforceable undertakings if required, plus keeping the Regional Council of Goyder formally apprised of events along the way. That way, the Council doesn't have to move a motion that says, 'please explain'.

The community is now split on the way forward. Many would like Burra chapter restored with new protocols, while others would like a new body established with arrangements renegotiated from scratch. Given the current trajectory of investigations, with attempts at silencing through confidentiality and subtle threats of findings for non-participants, the chances of restoration appear remote.

The other question is what you as a state council wants. If the goal is amends and remediation, that requires saying so in a loud and clear voice, requiring a decisive break with the past. Retaining a new CEO with people skills and a talent for bringing heritage, preservation and community together. The current one, a dissembling no-show with no interest in accountability, is not fit for the position.

After the September 20 meeting, I met with Barry Gamble, the expert on UNESCO bids, and he was astonished that the local branch was in suspension with tension and ill will abounding in the midst of a World Heritage bid. On Friday the 14 October there is another public town hall meeting in support of the local Burra branch of the National Trust, I will be attending and supporting the community consensus in this wholly lamentable, unnecessary episode.

Whatever the outcome, it's clear a newly elected council will have an important role in interceding on the community's behalf.

Regards

Russell Skinner
Burra SA

From: [redacted] (AAR)
To: [redacted] (DEM)
Cc: [redacted] AAR:Correspondence; DEM:Energy Regulation; AAR:Heritage
Subject: RE: HRE Act referral - Request for comment: Temporary Workers Accommodation Facility – Aberdeen Oval
Date: Monday, 27 July 2026 8:36:46 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.gif

OFFICIAL

Dear [redacted]

Re: Request for Comment, Regional Council of Goyder - Temporary Workers Accommodation Facility – Aberdeen Oval

Aboriginal Affairs and Reconciliation (Attorney General's Department) (AAR) has reviewed the relevant documentation for the project (SEO and EIR). AAR notes a key objective of the project (OBJ 4) is to 'minimise disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places'.

In doing so AAR notes the following from the EIS:

- that the project footprint is in an already cleared and disturbed area of land
- that the Regional Council of Goyder (RCG) has requested a search of AAR's central archives, which did not identify any Aboriginal heritage in the proposed project footprint (plus a 50m buffer)
- that RCG has developed a Cultural Heritage Management Plan in consultation with the Ngadjuri community (via the Ngadjuri Nation Aboriginal Corporation)
- RCG's commitment to ongoing engagement with NNAC during project development and works
- RCG's commitment to adhere to the provisions of the *Aboriginal Heritage Act 1988* (SA) (AH Act) and comply with the Aboriginal Heritage Discovery Protocols (including both sites and ancestral remains' protocols) should heritage be uncovered during project planning or project works.

Given the attention to detail to Aboriginal heritage management for the Aberdeen Oval; the absence of known heritage sites in the project footprint; and RCG's commitment to adhere to the AAR's Protocols, AAR raises no concerns with the proposal from an Aboriginal heritage management perspective. However, noting that NNAC has not yet accepted the offer of a site survey, AAR urges RCG to continue to approach the Ngadjuri community/NNAC with an offer to participate in a heritage survey/walkover of

the project footprint; proiro to Project works occurring. Undertaking a survey of this nature is the most effective way to mitigate any potential damage to heritage.

Please find attached a copy of AAR's Aboriginal Heritage Protocols that applies where there is no authorisation under the *AH Act*. AAR notes further that, in the event of a discovery of Aboriginal sites, objects or remains, in addition to stopping works, section 20 of the AH Act requires the discovery to be reported to the Minister, as soon as practicable.

Kind regards

[redacted]

[redacted] | A/Principal Project Officer Aboriginal Heritage
Aboriginal Affairs and Reconciliation
Attorney-General's Department

[redacted]

A: Level 16, Wakefield House, 30 Wakefield Street ADELAIDE SA 5000
GPO Box 464, ADELAIDE SA 5001

Attorney-General's Department Disclaimer:
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From: [redacted] (DIT)
To: [redacted] (DEM); council@goyder.sa.gov.au
Subject: RE: HRE Act referral - Request for comment: Temporary Workers Accommodation Facility – Aberdeen Oval
Date: Wednesday, 15 July 2026 2:02:13 PM
Attachments: image008.png
image009.png
image010.png
image011.png
image012.png
image013.png
image014.png
image015.png
image016.png
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OFFICIAL

Hi [redacted]

Thank you for the information provided regarding the proposed access arrangements to Barrier Highway.
Following our review of the submitted plans and supporting documentation, please provide further information and clarification on the following matters:

1. **Need for New Access-** It is not clear why a new access is required at the proposed southern location. Please provide justification for the proposed access and confirm its offset distance from the existing access point.

2. **Existing Access Arrangements -** Please clarify the intended arrangement for the existing access should the proposed southern access be supported. Specifically, advise whether the existing access will be retained, modified, or closed, and provide details of any associated works.

3. **Appropriateness of Proposed Turn Treatment –** DIT review has identified that the proposed southern access is located within an 80 km/h environment on a route that accommodates significant heavy vehicle and road train movements. Based on the information submitted, it is not evident that the proposed Basic Right Turn (BAR) treatment represents the most appropriate access treatment for this location. DIT considers that a higher-order treatment, such as a Channelised Right Turn (CHR(s)), may provide a safer outcome for right-turning vehicles.
   Accordingly, please provide an assessment comparing the proposed BAR treatment with a CHR(s) treatment, having regard to traffic volumes, vehicle composition, operating speeds, safety performance and relevant Austroads and DIT design criteria.
   The assessment should also consider whether a CHR(s) treatment could be extended southward to tie into the existing CHR treatment at West Street and facilitate a short right-turn lane into the Golf Club access. If a CHR(s) treatment is not proposed, please

provide justification demonstrating why the BAR treatment is considered appropriate for this location

The concept design must include-

- Lane widths and geometric layout dimensions.
- Clearance distances to existing roadside vegetation and other roadside hazards.
- Design vehicle details and swept path assessment, where applicable; and
- Demonstration of compliance with relevant Austroads and DIT design requirements.

The above information is required to enable DIT to properly assess the proposed access arrangement and determine whether the proposed turn treatment is appropriate for this location.

Thank you and Kind Regards.

[redacted]
Transport Assessment Officer
Transport Network and Investment Strategy

[redacted]
L7, 83 Pirie Street, ADELAIDE SA 5000 • GPO Box 1533, Adelaide SA 5001 • DX 171

The Department for Infrastructure and Transport acknowledges the Traditional Custodians of the Country throughout South Australia and recognises their continuing connection to land and waters. We pay our respects to the diversity of cultures, significance of contributions and to Elders past, present and emerging.

We are committed to creating a diverse and inclusive culture where everyone is valued and respected.

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Government of South Australia
Department for Environment and Water

DEW-D0036187

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[redacted]
Manager, Environmental Regulation
Department for Energy and Mining
GPO Box 618
ADELAIDE SA 5001

By email: DEM.EnergyRegulation@sa.gov.au

Dear [redacted]

Project:	Temporary Workers Accommodation Facility – Aberdeen Oval
Application:	Associated Infrastructure Licence (AIL) under the HRE Act
Applicant:	Regional Council of Goyder
Location:	7259 Barrier Highway, Burra, South Australia 5417 Within the township of Burra and 170 km north of Adelaide

Thank you for your email dated 11 June 2026 inviting the Department for Environment and Water (DEW) to comment on the application from Regional Council of Goyder for an Associated Infrastructure Licence (AIL) under the *Hydrogen and Renewable Energy Act 2023* (HRE Act) for the Temporary Workers Accommodation Facility – Aberdeen Oval (the Project).

DEW has reviewed the applicant's draft Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) and associated documentation supporting the proposed AIL to construct, operate and decommission the Temporary Workers Accommodation Facility – Aberdeen Oval (the Project). Comments on the potential impact of the project on matters within DEW's area of responsibility pursuant to section 73 and regulation 40 of the HRE Act and Regulations are provided in Attachment A.

In summary, DEW does not have any major concerns with this proposal and has considered the following matters, providing detailed comments in the attached submission (Attachment A):

- The project site is an unused oval, known as the former Aberdeen Oval, on the northern outskirts of the township of Burra and outside the boundary of the Burra State Heritage Area.
- Impacts on heritage values for Burra have been thoughtfully mitigated through careful design to reduce visual impacts towards the State Heritage Area.

- The inclusion of the Native Vegetation Clearance Data Report is acknowledged and appreciated. Separate to this, DEW understands that a native vegetation clearance application has been made by the applicant to the Native Vegetation Council, noting this is not a matter for DEW.
- There are no significant biodiversity values or known threatened flora or fauna species recorded at the project site.
- Minor amendments to the environmental objectives are recommended to strengthen non-Aboriginal heritage protection and climate change resilience.
- Flood mitigation measures for the neighbouring Burra Creek have been carefully considered by the applicant. DEW acknowledges these efforts and supports the use of more recent data and flood mapping.
- The project site is not located within a prescribed water resources area and there is no intention to access native water for this proposal. DEW has recommended an existing well on the subject land be investigated to exclude groundwater impacting activities.

Comments are provided to assist the Minister for Energy and Mining with the environmental assessment of this application and DEW officers are available if you have any questions or require further clarification or advice regarding these comments.

For further information regarding this matter, please contact [redacted], Director Planning and Heritage, DEW on [redacted].

Yours sincerely

[redacted]

[redacted]

CHIEF EXECUTIVE

28/07/2026

Government of South Australia
Department for Environment and Water

Attachment A – Department for Environment and Water submission: Temporary Workers Accommodation Facility – Aberdeen Oval DEW-D0036187

Documentation for Review: Draft Environmental Impact Report & Statement of Environmental Objectives - Burra Temporary Workers Accommodation Facility

Relating to the Application for: Associated Infrastructure Licence (AIL) under the *Hydrogen and Renewable Energy Act 2023* (HRE Act)

Project Name: Temporary Workers Accommodation Facility – Aberdeen Oval (the Project)

Application: Associated Infrastructure Licence (AIL) – for the development of a temporary workers accommodation facility

Applicant: Regional Council of Goyder (the applicant)

Location: 7259 Barrier Highway, Burra, South Australia (SA) 5417, approximately 170 kilometres (km) north of Adelaide on the Yorke Peninsula
Located within the township boundary of Burra, approximately 3 km north of the centre of Burra, on the town's northern entrance
Lot 47 F 186986 Hundred of Kooringa, Certificate of Title 5739/534 (subject land), within the Yorke and Mid North Region of SA.

Development Site: The subject land comprises approximately 29.47 hectares (ha). The proposed development site (also referred to as the Project Area or licence area) forms part of the subject land and covers approximately 5.4 ha. The site, known as the former Aberdeen Oval, is situated on freehold land owned by the Regional Council of Goyder. It comprises a disused oval containing some native vegetation, with Burra Creek located to the south and west of the development site.

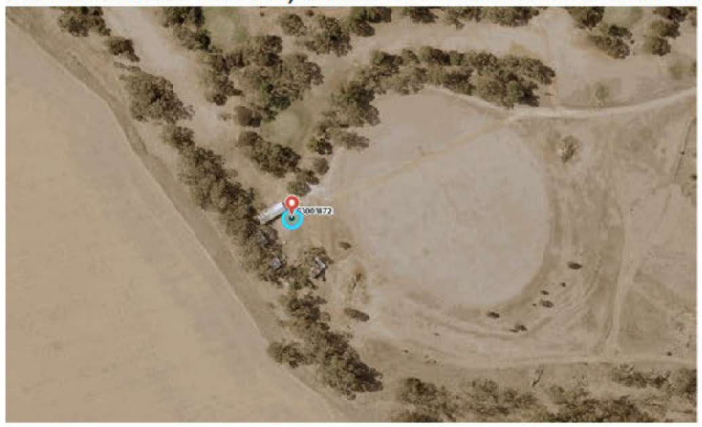
The Department for Energy and Mining (DEM) is the State Agency responsible for administering the *Hydrogen and Renewable Energy Act 2023* (HRE Act) and applications for an Associated Infrastructure Licence (AIL). Regional Council of Goyder (the applicant) has applied to DEM for an AIL for consideration under the HRE Act for the Burra Temporary Workers Accommodation Facility and as part of this application process has provided a draft Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) for consideration.

Under the HRE legislation the 'administrative unit of the Public Service, under a Minister, responsible for the administration of a prescribed Act' is considered a prescribed body, which means that applications for licences will be referred to the Department for Environment and Water (DEW) for review and comment on matters relevant to the legislation DEW administers. The relevant prescribed Acts administered by DEW related to this project are:

- *National Parks and Wildlife Act 1972* (NPW Act)
- *Landscape South Australia Act 2019* (Landscape Act)
- *Heritage Places Act 1993* (HP Act)

DEM has referred this matter to DEW as a prescribed body under the HRE Act and has requested that DEW provide comment on the draft EIR and SEO, under section 73 and Regulation 40 of the HRE Act and regulations, and in doing so consider the following questions:

1. has the applicant adequately described the existing environment, as far as this is relevant to the proposed operations?
2. has the applicant adequately identified the potential impacts on the environment that may arise from the proposed operations?
3. are the proposed environmental objectives acceptable?
4. are the proposed mitigation measures practical and likely to achieve the desired objectives?
5. are the proposed assessment criteria suitable to demonstrate achievement of the proposed objectives?

Report Reference / DEM questions / Value	Topic / Comments
Existing Environment	**Has the applicant adequately described the existing environment, as far as this is relevant to the proposed operations?** The Department for Environment and Water (DEW) notes and recommends the following: <u>Biodiversity</u> • The applicant has adequately described the existing environment in the Environmental Impact Report (EIR) and DEW concurs that the footprint of the temporary workers accommodation does not contain significant biodiversity values. • DEW acknowledges and appreciates the inclusion of the Native Vegetation Clearance Report in the EIS (Attachment C). <u>Native Fauna</u> • The environmental description in the EIR was primarily informed by public databases and the applicant's technical assessment. Aside from this desktop review and assessment, only a single field visit was undertaken over one day during summer (in February 2025), when not all flora and fauna species may have been present or readily detectable. • Further consideration of the existing environment may be required in the future, separate from this project, should the applicant proceed with its longer-term plan to relocate the caravan park to this site. If the caravan park footprint is expanded beyond the currently proposed development area, additional assessment may be required for less mobile listed species known to occur within 5 km of the site, including the Pygmy Blue-tongue Lizard and Flinders Ranges Worm Lizard. <u>Water Resources</u> • Burra Creek is situated to the south and west of the development site and discussed in terms of potential flood risk in the EIR. • There is potentially an underground water well located on the proposed development site that may need to be considered to be properly maintained or capped. **Well unit number 6630-03872** appears on our records as being located on Certificate of Title 5739/534 (the subject land) between the former Aberdeen Oval and the Burra Creek issued under Well Construction Permit Number 358411, drilled on 24 March 2020 with a depth of 67m. 

	Flood • Based on the 1% AEP flood inundation map available in the Burra Storm Water Management Plan, there is a high likelihood that Aberdeen Oval would be inundated by overflow from Burra Creek. This issue is already highlighted in Section 4.6.2 of the EIR. Further information is provided below under the section "potential impacts on the environment" Stormwater • Stormwater is adequately addressed for the proposed temporary accommodation and DEW has no concerns at this stage. Heritage – Non-Aboriginal • The EIR adequately describes the heritage values of the area, including recognising Burra's status as a State Heritage Area and National Heritage Place, and the inclusion of the Australian Cornish Mining Sites at Burra and Moonta on the World Heritage Tentative List. It is noted that Aberdeen Oval is within the township of Burra although outside of the Burra State Heritage Area. Native Vegetation *Note: The Native Vegetation Council assess native vegetation clearance matters. This is not a matter for DEW.*
Potential Impacts	**Has the applicant adequately identified the potential impacts on the environment that may arise from the proposed operations?** DEW notes and recommends the following: DEW note that the applicant has thoroughly addressed the avoidance, reduction and management of impacts on the environment through: • all phases of the regulated activities including construction, operation and decommissioning and rehabilitation were considered when identifying the environmental elements; and • approved management plans, incorporating best practice appropriate protocols, procedures will be developed and controls put in place. Biodiversity • The development footprint of the temporary workers accommodation does not contain significant biodiversity values, and no substantial impacts are expected. As described above under the section "Existing Environment" further consideration and assessment may be required in the future if the caravan park footprint is expanded beyond the currently proposed development area. Native Fauna • Whilst there is no recorded presence of NPW listed native fauna onsite, native fauna may access the site where these potential impacts can be adequately addressed to include the management of native fauna and mitigation of risks. These risks include native fauna that may access the site or be at risk of injury due to collisions with vehicles or entanglement with fencing or infrastructure.

	• It is understood that appropriate protocols, procedures and other controls will be in place and incorporated into management plans under best practice. It is recommended that during each stage of the proposed development and any investigations or assessments on the project site, should the applicant need to catch, move, relocate or destroy any protected animal or eggs, the applicant is required to apply for a permit under South Australian legislation to DEW. Further information can be obtained at DEW's website (and added to management plans) to apply for a permit to capture, release or destroy wildlife at: https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/capture-release https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/destroy Water Resources • It is noted that native water is not expected to be impacted by this proposal, and external sources of water will be used for potable water and water for construction. • Should there be a need for underground water use, a well construction permit may be required pursuant to the *Landscape South Australia Act 2019* (Landscape Act). Please contact the DEW Water Licensing Branch on (08) 8372 7561 for advice regarding matters concerning underground water authorisations (see more contact details in below section), this is also required to be included in the EIR. • In regard to maintenance of wells, under section 119 of the *Landscape South Australia Act 2019*, there is an obligation on the occupier of land on which a well is situated to ensure that the well is properly maintained, this includes the casing, lining, and screen of the well and the mechanism (if any) used to cap the well. DEW advises that wells that are not correctly maintained can result in groundwater impacting activity that have a negative effect on the environment. • It is noted that Well unit number 6630-03872 is located on the subject land although unsure if this is on or near the proposed development footprint which requires clarification by the applicant further discussion with DEW if this is the case. • Whilst the proposed development may not necessarily present a groundwater impacting activity with respect to the resource, DEW has experienced that legacy well locations can present a risk pathway for contamination dispersion during both construction and operation if they remain in place. DEW recommend that a well audit be conducted on site and potentially also the immediate vicinity to gauge an up-to-date record on the status, condition, and use of reported well infrastructure and to plan for remedial or mitigation activities, if necessary, prior to construction. DEW also recommend that results of well auditing be reported to DEW for record -keeping purposes. Please note that remedial action may require a permit and the applicant is advised to contact DEW Water Licencing for advice. • A well construction permit is required for any works on wells that involves drilling, plugging, backfilling or sealing of a well, or repairing, replacing or altering the casing, lining or screen of a well. • If any well is unable to be maintained once the temporary accommodation and associated infrastructure is built, DEW strongly recommends that it be backfilled by a licensed well driller. Please contact the DEW Drilling Inspector on (08) 8463 6876 regarding maintenance of wells or any questions on this matter. Flood • As described in the above section for "existing environment", there is a high likelihood that Aberdeen Oval would be inundated by overflow from Burra Creek which has been highlighted in Section 4.6.2 of the EIR.

	• It is evident that much consideration has already been given by the applicants in relation to flood management. DEW reinforces that effective flood mitigation measures will be required to be managed for the proposed development site, and the following considerations are recommended for both temporary and permanent facilities: ○ The current flood inundation mapping is based on 2012 catchment hydrology, 2006 Census population data, 2016 IFD design rainfall data, and the Draft Climate Change and Natural Resources Management Plan (January 2011). Many of these inputs have since been updated. Revised flood inundation mapping using contemporary datasets is therefore required to support reliable flood mitigation planning. ○ Potential improvements or deficiencies in the stormwater network should be assessed and incorporated to ensure the system is accurately represented during a flood event. ○ It is also important to assess the potential impacts on the surrounding area once mitigation measures are implemented for the temporary workers' accommodation facility/permanent structures, particularly any changes to flood behaviour around Aberdeen Oval. • DEW releases Climate projections that are relevant. These are available at https://www.environment.sa.gov.au/climate-viewer/details/ <u>Stormwater</u> • Whilst DEW has no specific stormwater concerns at this stage, DEW is aware that the Councils longer term plan for the site is to re locate the caravan park, which would likely introduce permanent structures and accommodation. DEW therefore suggests that the stormwater basin should be sized using the most up to date Australian Rainfall and Runoff guidance, including consideration of how future climate change may affect rainfall intensities. <u>Heritage - Non-Aboriginal</u> • The proposed development may affect views towards Burra when approaching the State Heritage Area from the west. Although the site is located outside the State Heritage Area, the EIR recognises Burra's visual setting as a heritage value in Sections 4.7.4 (European Cultural Heritage) and 4.11.3 (Visual Amenity). <u>Native Vegetation</u> *Note: The Native Vegetation Council (NVC) assess native vegetation clearance matters. This is not a matter for DEW.* • DEW notes that the applicant has applied to the NVC for clearance native vegetation which is being considered by the NVC.
Environmental Objectives	**Are the proposed environmental objectives acceptable?** DEW notes and recommends the following: • The environmental objectives described in the SEO are comprehensive and generally well-articulated. However, DEW recommends the following **minor amendments** in relation to prescribed acts under its administration: ○ **No** damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and **places unless authorised under the relevant legislation** ○ **Minimise greenhouse gas emissions during construction, operation, decommissioning and rehabilitation phases**

Mitigation Measures	**Are the proposed mitigation measures practical and likely to achieve the desired objectives?** Further to details described above under **Potential Impacts,** DEW recommends and notes the following: <u>Native Fauna</u> • Mitigation measures are practical, and control measures are thorough related to impacts on fauna management, for example it was pleasing to see the inclusion in #BI002 "Presence of personnel, vehicles, noise and vibration during the regulated activities impacts local fauna" to limit the speed of vehicles in internal driveways. • DEW notes that management plans will be developed incorporating relevant assessments and procedures and recommendations to incorporate the following if not already considered: o Add details relating permits required to catch, move, relocate or destroy any protected animal or eggs in the mitigation measures and within relevant management plans during each stage of the proposed development and any investigations or assessments on the project site. <u>Heritage - Non-Aboriginal</u> • It is noted that the EIR discusses mitigation measures for the impacts on heritage under EIR Section 4.11.3 Visual Amenity, demonstrating how the subject site has been designed to reduce its visual impact on views towards the State Heritage Area. These include: o The site is low-lying and not elevated, significantly reducing its visibility from surrounding areas. o The northern portion of the subject land is used as a golf course and contains extensive vegetation, which provides effective visual screening. o The subject land adjoins Burra Creek, where mature vegetation further softens views of the site and integrates it into the surrounding landscape. o Established mature vegetation along the Barrier Highway frontage provides an additional visual buffer, minimising the perception of development from key public viewpoints. o The proposed site will be temporary (18 months) for use only while workers accommodation is required. o Buildings are low in scale and centrally positioned to limit their visibility. • It is further noted that EIR Section 5.2.4.5 Noise and Vibration has responded to DEW, Heritage SA previous request for monitoring of vibrations and possible impacts to historic structures in the State Heritage Area. Please refer to the above sections on "Existing Environment", "Potential Impacts" and "Environmental Objectives" for the remaining areas relevant to DEW's responsibilities (this includes Biodiversity, Water Resources and Stormwater).
Assessment Criteria	**Are the proposed assessment criteria suitable to demonstrate achievement of the proposed objectives?** As recommended above in the "Environmental Objectives" section and "Mitigation Measures" sections above, DEW recommends updating the SEO and EIR to include amendments to the environmental objectives (which relates to the objectives for *Heritage- Non-*

Aboriginal and an addition objective related to *Climate Change*) and ensure the associated risk assessment criteria, leading performance criteria and control and management strategies are then adequately addressed in line with this.

Native Fauna

- In the EIR, Section 5.2.2 "*Biodiversity*", Table 5.2.2.1 "*Setting the Context – Biodiversity*", DEW recommends amending the "Applicable Non-Legislated Standards" column to included or refer to the following codes of practice for humane destruction of wildlife where relevant for any injured native animal on site which is located at: https://www.environment.sa.gov.au/topics/animals-and-plants/animal-welfare/codes-of-practice/codes-of-practice-humane-destruction-wildlife
    - Native Birds - https://cdn.environment.sa.gov.au/environment/docs/cop_humanedestructionbirds.pdf
    - Wombats – https://cdn.environment.sa.gov.au/environment/docs/cop-wombat-2018.pdf
    - Common brushtail possum – https://cdn.environment.sa.gov.au/environment/docs/cop_possum.pdf
    - Flocking birds - https://cdn.environment.sa.gov.au/environment/docs/cop_flockingbirds.pdf
    - Kangaroos and Wallabies – https://cdn.environment.sa.gov.au/environment/docs/code-of-practice-kangaroos-wallabies-non-commercial.pdf

  The *Animal Welfare Act 1985* can be referred to if there is not a relevant code on DEW's website and additionally advice for management of wildlife can be referred to within Table 5.2.2.1 with a link to the DEW's website advice located at https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife and species specific information on the native fauna including:
  Grey-headed flying foxes -
  https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/grey-headed-flying-foxes
  Snakes – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/snakes
  Possums – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/possums
  Wombats - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/wombats
  Little Corellas - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/little-corellas

Water Resources

- Well maintenance - Consider amending the Assessment Criteria in relation to obligations under the *Landscape South Australia Act 2019* to maintain underground wells as well as to carry out an audit for well/s on or near the subject land and development footprint and contact DEW in regard to responsibilities to maintain, backfill or cap. Please see contact details below for DEW Water Licensing and Driller Inspector contacts.

Heritage – Non-Aboriginal

- As detailed above in the "Environmental Objectives" section, DEW has recommended to strengthen the objective related to Heritage as follows: "**No** damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and **places unless authorised under the relevant legislation"**
- It is further recommended that assessment criteria and associated Leading Performance Criteria be strengthened to mitigate risks for historical heritage/archaeology, including:

	○ Completion of supporting heritage impact assessment. ○ Development of an OMP with project specific management and mitigation measures: ▪ All workers to undergo historical heritage/archaeology site inductions ▪ Implementation of an unexpected historical heritage discovery procedure (stop work, engage archaeologist to assess significance of the find, and recommence work only once authorisation received from the archaeologist) ▪ Immediate reporting if a site/object of heritage significance is disturbed without appropriate permit/approval ▪ Reporting of any other event where unknown historical heritage is discovered.
	Contact details
Contact details	**Department for Environment and Water** **Planning and Assessment Team** Contact: [redacted], Coordinator Assessments Email: DEWPlanningandAssessment@sa.gov.au **Water Licensing and Well Permits** Contact: Water Licensing Branch Email: dew.mywater@sa.gov.au or DEWwaterlicensing@sa.gov.au Website:https://www.environment.sa.gov.au/topics/water-and-river-murray/water-licences-allocations-and-markets/mywater-portal Phone: (08) 8372 7561 DEW Drilling Inspector regarding maintenance of wells. Phone: (08) 8463 6876 **Native Vegetation – Native Vegetation Council** Clearance of native vegetation associated with this project needs approval from the Native Vegetation Council (NVC) in accordance with the *Native Vegetation Act 1991*, and its regulations. The Native Vegetation Branch within DEW supports the NVC, contact details below. Contact: Native Vegetation Branch Native Vegetation & Pastoral Management Division Department for Environment and Water Email: DEWNVC@sa.gov.au Phone No: (08) 8303 9777

Government of South Australia
Department of Primary Industries and Regions

A7610530

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[redacted]
Environmental Assessment & Compliance Officer
Energy Regulation - Regulation and Compliance
Department for Energy and Mining

Email: DEM.EnergyRegulation@sa.gov.au

Dear [redacted]

Thank you for the referral for the Temporary Workers Accommodation Facility at Aberdeen Oval Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO).

As the authorised and delegated representative of the Minister for Primary Industries and Regional Development under section 73 of the *Hydrogen and Renewable Energy Act 2023*, on behalf of the Department of Primary Industries and Regions I provide the following comments:

- Page 11 of the SEO - PIRSA supports the early development of an effective economic benefit sharing strategy by the operator of the workers accommodation facility to support achievement of *Objective 5 to support positive engagement of services with Burra Community.*

- General comment - Particular emphasis should be placed on ensuring the ongoing procurement of food, supplies, services and other provisions from local businesses to support the worker accommodation facilities. This approach will maximise economic benefits for local businesses and the broader regional community, while also creating opportunities for enduring legacy benefits that extend beyond the life of the project. Regions supports the development in principle, noting the existing shortage of worker accommodation across the area. While the proposal may result in some reduced demand for neighbouring accommodation providers in the Clare Valley that currently service workers associated with wind farm and renewable energy developments, particularly during periods of lower tourism activity, the broader accommodation constraints in the region are well recognised.

Should you require any further information, please contact the Office of the Chief Executive at PIRSA.OCE@sa.gov.au in the first instance.

Thank you for the opportunity to comment on this matter.

Yours sincerely

[redacted]

[redacted]
CHIEF EXECUTIVE, PIRSA

20 / 07 / 2026

From: [redacted] (DHUD)
To: [redacted] (DEM)
Cc: DHUD:SPC Applications
Subject: RE: HRE Act referral - Request for comment: Temporary Workers Accommodation Facility – Aberdeen Oval
Date: Friday, 17 July 2026 1:36:30 PM
Attachments: image001.gif
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.gif

OFFICIAL

Hi [redacted],

I refer to the proposed Temporary Workers Accommodation at Burra (Aberdeen Oval) for a period up to 5 years. There are several major renewable energy projects which have received development authorisation and are progressing to construction within the Council area. Currently there is only one workers accommodation camp for approximately 70 people within the Council area, and the council advise there is a potential significant shortfall.

Thank you for your email dated 10 June 2026 requesting comment under Sections 73(2)&(4) of the *Hydrogen and Renewable Energy Act 2023* (the Act) in relation to the Regional Council of Goyder's application for an Associated Infrastructure Licence (AIL).

The Crown and Impact Assessment Team, Department for Housing and Urban Development (DHUD), has reviewed the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO).

The following comments and recommendations are made in DHUD's capacity as the administrative unit responsible for the administration of the *Planning, Development and Infrastructure Act 2016*, and a prescribed body pursuant to regulation 40 of the *Hydrogen and Renewable Regulations 2024*.

Criteria	Advice
Land Use	The subject site is located within the Recreation Zone of the Planning of the Planning and Design Code (the P&D Code). The zone envisages a range of accessible recreational facilities and does not anticipate temporary workers accommodation or tourist accommodation. If assessed under the Planning & Design Code (the Code) it would be a performance assessed development. The proposal will not alter or restrict the operation of existing recreational facilities, including the golf course, dog training facilities, or the tennis courts and associated clubrooms. The temporary nature of the development ensures that the land remains available for its intended long-term recreational purpose.

	It is noted that the Council has developed a Burra Township Master Plan, with accommodation for the provision of workers a topic considered in this body of work. As a result, Council has previously advised that as part of the Yorke Peninsula and Mid North Regional Plan it will consider rezoning a portion of the Aberdeen Oval site for workers and tourist accommodation. A number of overlays in the Code apply to the land. The EIR includes an assessment against relevant Code provisions and likely impacts. The EIR outlines the potential environmental hazards and consequences associated with these activities. While the proposed land use is not envisaged in the zone, it is considered acceptable on a short term (5 year) basis, provided it does not use restrict the operation of existing recreational facilities and achieves the environmental considerations outlined in the EIR and does not unreasonably impact the amenity of neighbours. Given the intent of the zone for recreational uses a code amendment should be explored for any long-term change of use to tourist accommodation.
Planning & Design Code	The EIR includes an assessment against relevant provisions of the P&D Code. In particular the following is noted. • The site is located within a low lying, previously excavated area which will reduce visual impact but is also prone to flooding. The applicant advises that flood mitigation measures will be incorporated into the proposed design. One option for flood mitigation works is the installation of an earth bund (berm) around the boundary of development area. Alternative floor mitigation measures in lieu of the earth bund may include increased site levels (filling of land) and/or setting minimum floor levels for buildings. A Hazard Management Plan and a flood mitigation strategy will be included in the OMP. Advice from DEW / landscape Board should be sought on the potential flooding hazard. • Detailed consideration has been given to the change to landform, land and water quality on adjacent land (including Burra Creek) in the EIR and is reflected in the SOE, with appropriate assessment criteria and leading performance criteria. • Native vegetation clearance is required, and a separate approval will be required from the Native Vegetation Council. • A new access from /to the Barrier Highway is proposed and will be subject to the approval of the Commissioner of Highways. • The site is within the Bushfire – Regional Overlay and the final layout of the development should facilitate access within the site and incorporate firefighting water (and equipment) as required by the CFS. • The remediation and rehabilitation of operational areas, where

	required, has been considered with the development of a Decommissioning and Rehabilitation Plan to be included in the OMP. This will include inspections to demonstrate no evidence of soil contamination or waste remaining as a result of activities. ● Potential impacts to sensitive receivers within the adjacent Recreation Zone include noise, light, visual intrusion and construction impacts. These impacts are given detailed consideration in the EIR and reflected in the SOE with appropriate assessment criteria and leading performance criteria. There were a number of submissions received from concerned residents in the Burra community, as outlined in the Engagement Plan. The applicant outlined a number of actions that will take place to address concerns raised, including: • Prior to commencement a CEMP, Decommissioning and Rehabilitation Plan (DRP) and OMP will be prepared. These will address the management of dust/air quality, stormwater, traffic/vehicle movement, flood mitigation, noise, erosion and sedimentation and waste management. • A community engagement strategy will be implemented for the construction and operational phases of the project, detailing ongoing consultation with landowners and occupiers in the locality, Council and identified key local stakeholders (business and residents). • A stakeholder complaints will be register will be established and maintained. • Compliance with relevant environmental acts (including noise, waste, nuisance). • On site parking and manoeuvring is provided for all vehicles anticipated to use the site.
Regional Plans	As outlined in the EIR the subject site is within the Yorke Peninsula and Mid Murray Regional Plan; the Landscape SA Northern and Yorke landscape region and the Flinders Lofty Block (FLB) bioregion and Broughton Association. <u>Yorke Peninsula and Mid Murray Regional Plan</u> *Burra is a Supporting Service Centre and tourist destination that provides essential services to surrounding rural areas and contributing to regional tourism, agriculture, and local business development. Burra's strategic location and historical significance will help strengthen connections across the Yorke Peninsula and Mid North, supporting broader regional development.* The site is identified in the plan for future tourism. An action is to finalise investigations and initiate a Code Amendment that will assist in unlocking

	potential tourism development in Burra. The land is also listed in the Plan as Native Title claims; Native Title register and well as other environmental indicators (water resources, climate change, native vegetation). <u>Landscape SA Northern and Yorke landscape region</u> *The landscape regions are administered by landscape boards, whose role is to administer the Landscape SA Act and define the priorities relevant to management of the natural resources of each region. Construction and operation activities undertaken under this EIR will need to align with the landscape management plans and policies for the Northern and Yorke landscape region.*
State Planning Policies	The proposal relates to State Planning Policy 9 (Employment Lands). *Providing a suitable supply of land for employment uses is critical to support job growth and the economic prosperity of communities. The planning system needs to support the diversification of our economy and remove barriers to innovation. It is critical that the right signals are sent to the market to attract interest, investment and tourism opportunities across South Australia.* Various other SPPs are relevant including SPP 4 which seeks to maintain and enhance South Australia's biodiversity and life supporting functions. The impact of the development on native vegetation and biodiversity will be considered under the *Native Vegetation Act 1991* and *EPBC Act 1999*.
Previous decisions	On 13 February 2025, the Minister for Planning (pursuant to Schedule 6A, Clause 1(2) of the Planning Development and Infrastructure (General) Regulations 2017) approved the request for temporary workers accommodation on the southern portion of Lot 474 Government Road and 7259 Barrier Highway at Burra (Aberdeen Oval). This made the application Accepted development with no planning assessment required. The PDI only allows this for a period of 2 years for temporary workers under Schedule 6A. It is understood that the site is expected to be used for this activity for up to 5 years and therefore approval is being sought under the HRE Act.
Other matters	NA

Should you have any further queries please do not hesitate to contact me.

Kind Regards

[redacted]
Team Leader, Crown Development

State Assessment
Planning and Land Use Services

Department for Housing and Urban Development

[redacted]
W dhud.sa.gov.au

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If you are visiting our office please phone or email ahead to make sure security access arrangements.



The Department for Housing and Urban Development acknowledges First Nation people as the Traditional Owners of South Australian land and waters and we extend our respect to Elders past, present and emerging. We value and recognise the ongoing cultural heritage, beliefs and relationship First Nations peoples have with these lands and waters and the continuing importance of this today.

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Native Vegetation Council

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Telephone [redacted]

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Adelaide SA 5000

GPO Box 1047
Adelaide SA 5001

Ph| 08 8303 9777

nvc@sa.gov.au

01 July 2026

[redacted]
Department for Energy and Mining
GPO Box 618
Adelaide, SA 5000
C/O laiwan.chan@sa.gov.au
[redacted]

Dear [redacted]

Thank you for the opportunity to review the Regional Council of Goyder's application pursuant to the *Hydrogen and Renewable Energy Act 2023* (HRE Act) for an Associated Infrastructure Licence (AIL) to develop the Temporary Workers Accommodation Facility – Aberdeen Oval. The Native Vegetation Council (Council) appreciates the inclusion of the Data Report and the proponent's efforts to address previous comments.

The Council is an independent statutory body established under the *Native Vegetation Act 1991* (NV Act). Its functions include keeping the condition of South Australia's native vegetation under review and advising in relation to the preservation, enhancement and management of existing native vegetation for the wellbeing of all South Australians. Further functions involve encouraging the re-establishment of native vegetation and research, considering applications to clear native vegetation, determining offsets, and enforcing compliance with the NV Act. The Council's work occurs on the lands and waters of the First Nations peoples of this country.

The Council acknowledges the Regional Council of Goyder's work in preparing the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) for their AIL application. The EIR and SEO detail a temporary worker facility proposed for the former Aberdeen Oval site, located at 7259 Barrier Highway, Burra (approximately 170 km north of Adelaide). The project will address a shortage of accommodation for approximately 400 temporary workers; all engaged in the construction phase of the 'Goyder North' development.

It is noted that the Council has received a clearance application pursuant to the NV Act. The proposal involves the clearance of 1.66 ha of Austrostipa grassland, in addition to 16 juvenile scattered trees comprising 11 river red gum (*Eucalyptus camaldulensis*), four (4) sugar gum (*Eucalyptus cladocalyx*) and one (1) black box (*Eucalyptus largiflorens*). This application has been received as a level 4 clearance.

The Council provides the following feedback:

- The proponent has adequately referred to and updated documentation to reflect previous Council advice, incorporating the recommended sources of indirect impacts on native vegetation and providing a complete Data Report and associated assessment scoresheets.

- The proposed clearance will be assessed under Section 28 of the NV Act. Subject to subsection (3) of the NV Act, the Council cannot give its consent to the clearance of native vegetation if the vegetation comprises or forms part of a stratum of native vegetation that is substantially intact. The Council will consider whether the vegetation association and scattered trees form part of an intact stratum when assessing the application.

- The Council acknowledges the Proponent's current efforts to 'avoid' and 'minimise' clearance. Notable project measures include:
    - Avoiding the clearance of riparian vegetation and a majority of the site's scattered trees,
    - Limiting clearance activities to disturbed vegetation associations and juvenile trees while minimising impacts to native vegetation through strategic site selection and standard environmental controls, and
    - Committing to the use of locally indigenous native species for any future rehabilitation or restoration works.

- The Council notes the proponent's intent to offset clearance via the payment of $48,014.58 into the Native Vegetation Fund. Under sections 28(3)(b)(i)(D) and 28(4) of the NV Act, the proponent must provide information to establish that it is not possible for the applicant to achieve a significant environmental benefit through an on-ground offset before proposing to make a payment into the Native Vegetation Fund to compensate for the fact that there will not be a significant environmental benefit associated with the proposed clearance.

- The EIR's discussion of proposed decommissioning and rehabilitation work lacks detail regarding legislative requirements for such work. To address this, the Council encourages the eventual Closure Plan and Rehabilitation Plans to be drafted in accordance with legislative requirements (as well as stakeholder interests). Furthermore, the Council strongly supports intent to utilise locally indigenous native species for any future rehabilitation or restoration works.

- Following a preliminary assessment of information provided in the Native Vegetation Clearance Data Report, the proposed clearance is Seriously at variance with Principles of clearance 1(b), 1(d) and 1(e) of the NV Act. The Principles of native vegetation clearance — as outlined in Schedule 1 of the *Native Vegetation Act 1991* — state that native vegetation should not be cleared if, in the opinion of the Council, it:
    - has significance as a habitat for wildlife,
    - comprises the whole, or a part, of a plant community that is rare, vulnerable or endangered; or
    - has significance as a remnant of vegetation in an area which has been extensively cleared.

  Any moderating factors will be considered during the assessment of the application.

- The Council encourages greater specificity regarding the Proponent's approach to weed management, particularly with regard to the following declared weeds and Weeds of National Significance (WoNS): salvation Jane (*Echium plantagineum*), horehound (*Marrubium vulgare*), Aleppo pine (*Pinus halepensis*), and silver-leaf nightshade (*Solanum elaeagnifolium).* The Council also notes intent to maintain some Aleppo pine for visual screening and advises against this where possible. The Council recommends contacting the relevant landscape board for further advice regarding declared plants.

- The Council welcomes the intent to establish buffer areas for the adjacent Burra Creek riparian ecosystem and significant roadside vegetation. Maintaining a buffer zone between the watercourse and development will protect the adjacent watercourse, while also ensuring that vegetation has the space to avoid damage and grow. Furthermore, the Council recommends designating these buffer zones as areas wherein all remnant native vegetation is retained and preferably restored.

- The assessment criteria for impacts related to the clearance of native vegetation (see SEO OBJ 3) notes that there is to be 'no clearance of native vegetation or disturbance to native fauna unless prior approval under the relevant legislation is obtained'. Yet this criterion lacks key detail. The Council encourages further detail when outlining this assessment criteria in both the EIR and SEO. Suggesting phrasing is as follows:
    - 'Native vegetation clearance should be avoided or minimised where reasonably possible - unless it results in a SEB sufficient to offset the impact of clearance.'

- The Council notes that the following legislation and non-legislated instruments should be captured when summarising biodiversity matters (see section 5.2.2.1):
    - Applicable Government Legislation: *Biodiversity Act 2025* (when implemented)
    - Applicable Non-Legislated Instruments: Policy for a Significant Environmental Benefit.

- The EIR identifies the filling of land as a potential flood mitigation measure (see section 2.4). The Council notes that any additional native vegetation clearance associated with the potential filling of land will require further Council approval.

Thank you again for the opportunity to provide comments on the proposal. If you have any questions about this submission, please contact [redacted], A/Manager, Native Vegetation on telephone number [redacted] or email [redacted].

Yours sincerely

[redacted]

Presiding Member

NATIVE VEGETATION ASSESSMENT PANEL

cc: DEM.EnergyRegulation@sa.gov.au

Application ID
23867119

Created
27/07/2026 10:48 AM

Modified
27/07/2026 12:35 PM

Name
[redacted]

Organisation
SA Country Fire Service

Email
das@cfs.sa.gov.au

Which sections of the EIR and/or SEO does your feedback relate to?
Bushfire risk.

Comments
The CFS supports the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO), noting that both documents incorporate advice provided by the CFS during the consultation phase.

The CFS reiterates the importance of ensuring that the proposed site layout appropriately reflects the fire safety requirements of the National Construction Code (NCC). While these matters fall within building rules and are not specifically determined by the CFS, they may nonetheless influence site planning and should be considered early to avoid future design constraints.

The CFS looks forward to providing further advice during the detailed design phase. Additional input at that stage may necessitate amendments to the site layout to ensure that bushfire safety considerations are adequately addressed.

All future correspondence relating to the design phase must be directed to the CFS Development Assessment Service, rather than the local CFS brigade, to ensure that statutory and technical advice is provided through the appropriate channel.

LANDSCAPE SOUTH AUSTRALIA NORTHERN AND YORKE

[redacted]
Environmental Assessment & Compliance Officer
Energy Regulation | Regulation and Compliance
Department for Energy and Mining
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REF: EP20260724

21/07/2026

For Comment: Temporary Workers Accommodation Facility - Aberdeen Oval – Updated Environmental Impact Report and Statement of Environmental Objectives

Dear [redacted],

The Northern and Yorke Landscape Board (hereafter the Board) thanks the Department for Energy and Mining for the opportunity to provide comment on the updated Statement of Environmental Objectives (SEO) and Environmental Impact Report (EIR) for the proposed Temporary Workers Accommodation Facility at Aberdeen Oval. We originally provided comment on the draft SEO and EIR on 20 February 2026. Please find our comments on the updated documents below.

Proposal:

The proposed development of temporary accommodation for approximately 400 workers for up to five years at Aberdeen Oval in Burra, on the lands of the Ngadjuri People. The proposal will support workers for the construction of Neoen's Goyder North Wind Farm, expected to begin in the second half of 2026.

Comments relating to the EIR and SEO:

Native flora and fauna

The Board welcomes the inclusion of a Flora and Fauna Management Plan to be developed as part of the proposed project.

Impacts to Burra Creek

The Board appreciates the response to our previous correspondence regarding seemingly conflicting information in the EIR about potential impacts to Burra Creek. This stated that the EIR seeks to anticipate potential impacts to the Creek without the knowledge of the final design of flood mitigation and stormwater management (page 172). These works have the potential to significantly alter the level of impact that the proposed project has on the surrounding environment, and therefore without this information, the Board cannot conclusively comment on the impact of the proposed project. We do however, note that the intent is to minimise or avoid impacts to surface water in the Creek.

Any clearance of high-quality native riparian vegetation around Burra Creek will require additional Native Vegetation Council (NVC) clearance approval, as this was not included in the initial Native Vegetation Clearance Data Report developed by Umwelt or application submitted to the NVC. As already acknowledged in the SEO and EIR, the project proponent may also need to engage with the Board regarding a Water-Affecting Activity (WAA) permit as per the Board's **WAA Control Policy**.

Weed management

The Board welcomes the inclusion of a Weeds and Pests Management Plan to be developed as part of the proposed project, and the inclusion of the removal of Aleppo pines (*Pinus halepensis*) in the Decommissioning and Rehabilitation Plan.

The Native Vegetation Clearance Data Report developed by Umwelt and included as Attachment C in the EIR, notes the presence of silver-leaf nightshade (*Solanum elaeagnifolium*) at the project site. This is, however, not included in the listed weeds in Section 4.5.1. (page 37) of the EIR. Silver-leaf nightshade is a Weed of National Significance and under the *Landscape SA Act 2019*, landholders are legally required to control infestations on their property, prevent the plant from spreading and avoid transporting or selling the weed. The Board recommends control measures be undertaken as per the **PIRSA website** and its inclusion in the Weeds and Pests Management Plan alongside the other Declared Plants identified at the site. Landscape Board staff are available to provide advice regarding the management of these weeds, if needed.

Yours Sincerely,

[redacted]

[redacted]
General Manager
Northern and Yorke Landscape Board

21/07/2026

Appendix B – Responses to submissions received (excerpt from EIR)

Summary Of Submissions During Statutory Consultation

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
Government Agency Submissions			
1.0	**Native Vegetation Council**		
1.1	It is noted that the Council has received a clearance application pursuant to the NV Act. The proposal involves the clearance of 1.66 ha of Austrostipa grassland, in addition t16 juvenile scattered trees comprising 11 river red gum (Eucalyptus camaldulensis), four sugar gum (Eucalyptus cladocalyx) and one black box (Eucalyptus largiflorens). This application has been received as a level 4 clearance.	Confirm that NVC application for clearance has been lodged and conditional consent issued by Native Vegetation Council (NVC) on 31 July 2026 (refer **Appendix A**).	No alterations to EIR/SEO required.
1.2	The proponent has adequately referred to and updated documentation to reflect previous Council advice, incorporating the recommended sources of indirect impacts on native vegetation and providing a complete Data Report and associated assessment scoresheets.	Noted.	No alterations to EIR/SEO required.
1.3	The Council will consider whether the vegetation association and scattered trees form part of an intact stratum when assessing the application. the Council cannot give its consent to the clearance of native vegetation if the vegetation comprises or forms part of a stratum of native vegetation that is substantially intact.	The Native Vegetation Data Report prepared by Umwelt and considered by NVC does not identify this site as containing intact stratum. The site is highly disturbed given its previous use as an oval/recreation area.	No alterations to EIR/SEO required.
1.4	The Council acknowledges the Proponent's current efforts to 'avoid' and 'minimise' clearance. Notable project measures include: • Avoiding the clearance of riparian vegetation and a majority of the site's scattered trees; • Limiting clearance activities to disturbed vegetation associations and juvenile trees while minimising impacts to Native vegetation through strategic site selection and standard environmental controls; and • Committing to the use of locally indigenous native species for any future rehabilitation or restoration works.	Noted.	No alterations to EIR/SEO required.
1.5	The Council notes the proponent's intent to offset clearance via the payment of $48,014.58 into the Native Vegetation Fund. Under sections 28(3)(b)(i)(D) and 28(4) of the NV Act, the proponent must provide information to establish that it is not possible for the applicant to achieve a significant environmental benefit through an on-ground offset before proposing to make a payment into the Native Vegetation Fund to compensate for the fact that there will not be a significant environmental benefit associated with the proposed clearance.	Further discussions have been held with NVC regarding the provision of on-ground offset in lieu of payment to the Native Vegetation Fund. The Native Vegetation Data Report by Umwelt was updated (July 2026) to discuss the provision of on-ground offset. It is not the Regional Council of Goyders intention to provide an on ground offset for this development for the following reasons: • Umwelt have advised that there is a *SEB Credit - 2021/4001/433 (BCE/2019/NY08)* – within Clare and Gilbert Valleys, *Eucodorata open woodland,* 88.50 credits available, part of the Biodiversity Credit Exchange. Umwelt have made enquiries regarding the availability of this BCE and have been advised by the Native Vegetation Branch that the Native Vegetation Council is in the process of extinguishing credit associated with the BCE sites and the credit would not be available for use associated with an off set for the Aberdeen Oval development. • The workers accommodation use is temporary, for up t5 years. The form of development in this short term does not facilitate onsite revegetation. • The area defined for the temporary workers accommodation facility is approximately 5.2 hectares. The temporary workers accommodation facility will comprise a range of temporary buildings, along with parking areas which will cover a substantial portion of the site. The buildings will be developed in stages as the workforce is required (associated with the construction of the Goyder North wind farm by Neoen). • In preparing a response to the comments made by Government Agencies during the community consultation on the AIL, the matter of on-ground offset was discussed with Umwelt. MasterPlan understands that the provision of on-ground offset would require the preparation of a management plan. The management regime is likely to outlast the temporary (5 year) use of the site. • The workers accommodation project has an extremely tight timeframe, requiring the accommodation to be developed (in its first stages) in the last quarter of 2026 tenable workers to be accommodated for the	SEB offsets are discussed in EIR #BIO01 and SEO #Objective 3. The SEO clearly recognises the need to apply for NVC clearance and pay SEB. No alterations to the EIR/SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
		commencement of the Goyder North Wind Farm commencing concurrently. The preparation of a management plan associated with onground offset would require preparation, and subsequent approval by NVC. This process has potential time delay, along with the cost that was not considered warranted given the SEB obligation. • Longer term objective for the site is for the development of a caravan park. This form of development would be more accommodating for revegetation of the site. Council is the owner of the land and will facilitate the future use of a caravan park, but this also requires the land to be rezoned and then a design for the caravan park to be developed, and a development application (and potentially further NVC application) submitted. To create a high level of amenity for the caravan park, Council anticipates additional planting and revegetation, however this is most appropriately addressed through future Code Amendments and development applications.	
1.6	The EIR's discussion of proposed decommissioning and rehabilitation work lacks detail regarding legislative requirements for such work. To address this, the Council encourages the eventual Closure Plan and Rehabilitation Plans to be drafted in accordance with legislative requirements (as well as stakeholder interests).	There are numerous references in the EIR and SEO in relation to the Decommissioning and Rehabilitation Plan (DRP). This plan will be prepared in consultation with DEM (and approved by DEM). References to legislative requirements would form part of the DRP and the broader Operational Management Plan and its subplans. Further amendment to the EIR is not considered warranted at this time, but rather further details (as required) to be included in the DRP, OMP and associated subplans.	No alterations to the EIR/SEO are required.
1.7	The Council strongly supports intent to utilise locally indigenous native species for any future rehabilitation or restoration works.	Noted and the objective by the Regional Council of Goyder to facilitate the future use of the site as a caravan park, would facilitate additional planting and revegetation to create a high level of amenity for the caravan park. Revegetation of the site as part of a caravan park development would be most appropriately addressed through future Code Amendments and development applications.	No alterations to the EIR/SEO are required.
1.8	The Native Vegetation Clearance Data Report notes that the proposed clearance is Seriously at variance with Principles of clearance 1(b), 1(d) and 1(e) of the NV Act. Moderating factors will be considered during the assessment of the application.	The Native Vegetation Data Report by Umwelt addresses the moderating factors. The assessment of the NVC application has been undertaken and conditional consent granted (refer **Appendix A**).	No alterations to the EIR/SEO are required.
1.9	The Council encourages greater specificity regarding the Proponent's approach tweed management, particularly with regard to the following declared weeds and Weeds of National Significance (WoNS): salvation Jane (Echium plantagineum), horehound (Marrubium vulgare), Alepppine (Pinus halepensis), and silver-leaf nightshade (Solanum elaeagnifolium).	Additional specifics relating tweed management will be included in the Weed and Pest Management Plan (WPMP) (including hygiene practices) to be developed, approved and complied with for inclusion in the CEMP, SOMP and DRP.	The preparation of the WPMP is included in EIR #BIO03 and included in SEO objectives OBJ#1 and OBJ#2.
1.10	The Council welcomes the intent to establish buffer areas for the adjacent Burra Creek riparian ecosystem and significant roadside vegetation. Maintaining a buffer zone between the watercourse and development will protect the adjacent watercourse, while also ensuring that vegetation has the space to avoid damage and grow. Furthermore, the Council recommends designating these buffer zones as areas wherein all remnant native vegetation is retained and preferably restored.	The site of the development for the workers accommodation facility was designed so that it is not within 50 metres of the centreline of the Burra Creek. The area between the boundary of the facility and Burra Creek can be viewed as a "buffer" however it is not managed by the EIR/SEO, excluding any stormwater infrastructure that maybe included in the final design. The "buffer" area remains in the care and control of the Regional Council of Goyder and vegetation management will be ongoing, outside of the management of the workers accommodation facility.	No alterations to the EIR/SEO are required.
1.11	The assessment criteria for impacts related to the clearance of native vegetation (see SEOBJ 3) notes that there is to be 'no clearance of native vegetation or disturbance to native fauna unless prior approval under the relevant legislation is obtained'. Yet this criterion lacks key detail. The Council encourages further detail when outlining this assessment criteria in both the EIR and SEO. Suggesting phrasing is as follows: 'Native vegetation clearance should be avoided or minimised where reasonably possible - unless it results in a SEB sufficient to offset the impact of clearance.'	Noted and additional wording included in EIR #BIO01 and #BIO02 and SEO OBJ#3.	Amend wording in EIR #BIO01 and #BIO02 and SEOBJ#3 tread: "Native vegetation clearance should be avoided or minimised where reasonably possible, unless it results in a Significant Environmental Benefit (SEB) sufficient to offset the impact of clearance. No clearance of native vegetation or disturbance to native fauna unless prior approval under the relevant legislation is obtained".

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
1.12	The following legislation and non-legislated instruments should be captured when summarising biodiversity matters (see section 5.2.2.1): • Applicable Government Legislation: *Biodiversity Act 2025* (when implemented) • Applicable Non-Legislated Instruments: Policy for a Significant Environmental Benefit.	It is not considered appropriate to include legislation that is not yet enacted. Acknowledge and include reference to the SEB policy.	EIR Section 5.2.2.1 updated to include reference to the Policy for Significant Environmental Benefit (under the *Native Vegetation Act 1991 and Native Vegetation Regulations 2017*).
1.13	The EIR identifies the filling of land as a potential flood mitigation measure (see section 2.4). The Council notes that any additional native vegetation clearance associated with the potential filling of land will require further Council approval.	Should filling of the land be required and this impacts additional native vegetation then this will result in a variation and/or further native vegetation application.	No alterations to the EIR/SEO are required.
2	**Department for Infrastructure and Transport, Transport Strategy and Planning Division (DIT)**		
2.1	Need for New Access- It is not clear why a new access is required at the proposed southern location. Please provide justification for the proposed access and confirm its offset distance from the existing access point.	The need for the new access is discussed in the Traffic Impact Assessment (TIA) prepared by MFY, which forms part of the EIR (Attachment D). Refer Section 4.9 of the EIR. In addition to the TIA, MFY reviewed DIT comments (refer **Appendix B**) and have advised: *"The proposal will be for a separate and distinct use from the existing golf course and will occur within a separate licensed land area. The existing access is required for maintenance access to the golf course and while there is a gap in the double barrier line, the curve in the highway does present a sight distance constraint on this section of road which is evidenced by the double barrier line. The access to the site is which a 100km/h zone. It is incumbent on any developer to provide for safe and convenient access for a proposal, and this is a requirement in the Planning and Design Code. It would be irresponsible to suggest that this existing access is fit for purpose for the proposed development for which operation is completely separate from the golf course and for which access should be designed to satisfy appropriate Standards.* *The proposed access will be within an 80km/h zone which is a much safer speed environment in which to access the site. Further, Safe Intersection Sight Distance will be provided at the access in accordance with Austroads requirements. The location of the access has been identified to ensure it does not conflict with the existing golf course access on the opposite side of the highway and will be 85 m from the existing access".*	No alterations to the EIR/SEO are required.
2.2	Existing Access Arrangements - Please clarify the intended arrangement for the existing access should the proposed southern access be supported. Specifically, advise whether the existing access will be retained, modified, or closed, and provide details of any associated works.	Section 4.9.1 of the EIR states: The northern vehicle access, which currently provides access to golf course storage/maintenance facilities, and the revegetation group facilities will be retained. Council, in consultation with DIT, are examining the upgrading of the northern entrance/exit and any upgrades maybe undertaken pursuant to Council's legislative powers pursuant to the Local Government Act. Upgrading of this northern entrance/exit may provide suitable access for early construction traffic whilst a new vehicle access is being constructed. The northern access will provide for emergency service vehicle, potentially as a second access/egress point and the design of the crossover to Barrier Highway would take account the requirements for movement of these vehicles. EIR- Amenity and Safety – Hazards – Traffic: Impact ID #AS06 states: • The final design of the vehicle access to and from the Barrier Highway is designed by a suitably qualified engineer, which addresses: – the largest vehicle anticipated to utilise the site (e.g. 19m semi-trailer, buses, waste management vehicles, fire fighting vehicles etc; – retention and utilisation of the existing northern access point; – controlled access (boom gates or other form of security); – parking and manoeuvring for all vehicles. – and approved by the Commissioner of Highway (via Department for Infrastructure and Transport). Discussions with DIT will continue in relation to the design and approvals (as required) for modifications to the northern access. MFY have noted that "*The existing maintenance access for the golf course, which is also used for the vegetation facility, will be maintained".*	EIR - Amenity and Safety – Hazards – Traffic: Impact ID #AS06 and SEOBJ#6, OBJ#7, OBJ#8 and OBJ#10 remain unaltered in relation to safety of vehicle movements.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
2.3	Appropriateness of Proposed Turn Treatment – DIT review has identified that the proposed southern access is located within an 80 km/h environment on a route that accommodates significant heavy vehicle and road train movements. Based on the information submitted, it is not evident that the proposed Basic Right Turn (BAR) treatment represents the most appropriate access treatment for this location. DIT considers that a higher-order treatment, such as a Channelised Right Turn (CHR(s)), may provide a safer outcome for right-turning vehicles. Accordingly, please provide an assessment comparing the proposed BAR treatment with a CHR(s) treatment, having regard to traffic volumes, vehicle composition, operating speeds, safety performance and relevant Austroads and DIT design criteria. The assessment should also consider whether a CHR(s) treatment could be extended southward to tie into the existing CHR treatment at West Street and facilitate a short right-turn lane into the Golf Club access. If a CHR(s) treatment is not proposed, please provide justification demonstrating why the BAR treatment is considered appropriate for this location The concept design must include- • Lane widths and geometric layout dimensions. • Clearance distances to existing roadside vegetation and other roadside hazards. • Design vehicle details and swept path assessment, where applicable; and • Demonstration of compliance with relevant Austroads and DIT design requirements.	The Traffic Impact Assessment (TIA) prepared by MFY, which forms part of the EIR (Attachment D and referenced in Section 4.9) assesses the need or otherwise of a CHR. To clarify, MFY have advised that: *The assessment of the proposal clearly identifies that a CHR(s) treatment is not warranted based on the turning requirements of vehicles to and from the site. While the highway is gazetted for use by road trains, the volumes are low and the risk of conflict with the very low volumes turning to and from the site is negligible. Put more specifically:* • *Barrier Highway has an average annual daily traffic in the order of 1,500 vehicles;* • *the proportion of heavy vehicles is 24.5% which equates t370 vehicles per day;* • *of that volume, approximately 125 vehicles are PBS level 2A vehicles;* • *the number of right turning movements to the site is forecast to be 50 vpd;* • *the forecast average delay based on a critical gap acceptance calculation for drivers turning right to the site is 0.26 seconds;* • *This means that the probability of a PBS Level 2A or greater vehicle travelling southbound on the Barrier Highway coinciding with a vehicle stopped to give-way would be 0.00082 or there is a 0.08% chance that these would coincide.* *This means that not only will the warrant for CHR(s) not be met, but there would also be very limited evidence of measurable increased safety, given the anticipated operation of the access. Further, the proposed BAR will provide for passing of vehicles in the infrequent event that they be stored on the carriageway waiting to turn with a southbound commercial vehicle approaching. MFY Drawing No. MFY_260052_03_01-SH01A illustrates the proposed BAR treatment with dimensions as requested.* EIR - Amenity and Safety – Hazards – Traffic: Impact ID #AS06 states: • The final design of the vehicle access to and from the Barrier Highway is designed by a suitably qualified engineer, which addresses: – the largest vehicle anticipated to utilise the site (e.g. 19m semi-trailer, buses, waste management vehicles, fire fighting vehicles etc; – retention and utilisation of the existing northern access point; – controlled access (boom gates or other form of security); – parking and manoeuvring for all vehicles. – and approved by the Commissioner of Highway (via Department for Infrastructure and Transport). EIR - Amenity and Safety – Hazards – Traffic: Impact ID #AS06 and SEOBJ#6, OBJ#7, OBJ#8 and OBJ#10 remain unaltered in relation to safety of vehicle movements and requirement to obtain approval from DIT in relation to modifications to the Barrier Highway. The MFY Plan Drawing No. MFY_260052_03_01-SH01A and MFY_260052_03_01-SH02A have has been provided to DIT as part of this approval process and are attached in **Appendix B**.	EIR- Amenity and Safety – Hazards – Traffic: Impact ID #AS06 and SEO OBJ#6,OBJ#7, OBJ#8 and OBJ#10 remain unaltered in relation to safety of vehicle movements and requirement to obtain approval from DIT in relation to modifications to the Barrier Highway.
3.0	**Department for Housing and Urban Development (DHUD)**		
3.1	Land Use: The subject site is located within the Recreation Zone of the Planning of the Planning and Design Code (the P&D Code). The zone envisages a range of accessible recreational facilities and does not anticipate temporary workers accommodation or tourist accommodation. If assessed under the Planning & Design Code (the Code) it would be a performance assessed development. The proposal will not alter or restrict the operation of existing recreational facilities, including the golf course, dog training facilities, or the tennis courts and associated clubrooms. The temporary nature of the development ensures that the land remains available for its intended long-term recreational purpose. It is noted that the Council has developed a Burra Township Master Plan, with accommodation for the provision of workers a topic considered in this body of work.	DHUD agree with the Land Use assessment contained in Section 4.8 of the EIR, that the proposed land use is considered acceptable on a short term (5 year) basis, provided it does not use restrict the operation of existing recreational facilities and achieves the environmental considerations outlined in the EIR and does not unreasonably impact the amenity of neighbours. The site of the proposed workers accommodation facility has been selected sit does not impact on the existing recreational facilities, as discussed in several locations of the EIR.	No alterations to EIR or SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
	As a result, Council has previously advised that as part of the Yorke Peninsula and Mid North Regional Plan it will consider rezoning a portion of the Aberdeen Oval site for workers and tourist accommodation. A number of overlays in the Code apply to the land. The EIR includes an assessment against relevant Code provisions and likely impacts. The EIR outlines the potential environmental hazards and consequences associated with these activities. While the proposed land use is not envisaged in the zone, it is considered acceptable on a short term (5 year) basis, provided it does not use restrict the operation of existing recreational facilities and achieves the environmental considerations outlined in the EIR and does not unreasonably impact the amenity of neighbours. Given the intent of the zone for recreational uses a code amendment should be explored for any long-term change of use to tourist accommodation.		
3.2	Planning and Design Code: EIR includes an assessment against relevant provisions of the P&D Code. In particular the following is noted. • The site is located within a low lying, previously excavated area which will reduce visual impact but is also prone to flooding. The applicant advises that flood mitigation measures will be incorporated into the proposed design. One option for flood mitigation works is the installation of an earth bund (berm) around the boundary of development area. Alternative floor mitigation measures in lieu of the earth bund may include increased site levels (filling of land) and/or setting minimum floor levels for buildings. A Hazard Management Plan and a flood mitigation strategy will be included in the OMP. Advice from DEW / landscape Board should be sought on the potential flooding hazard. • Detailed consideration has been given to the change to landform, land and water quality on adjacent land (including Burra Creek) in the EIR and is reflected in the SOE, with appropriate assessment criteria and leading performance criteria. • Native vegetation clearance is required, and a separate approval will be required from the Native Vegetation Council. • A new access from /to the Barrier Highway is proposed and will be subject to the approval of the Commissioner of Highways. • The site is within the Bushfire – Regional Overlay and the final layout of the development should facilitate access within the site and incorporate firefighting water (and equipment) as required by the CFS. • The remediation and rehabilitation of operational areas, where required, has been considered with the development of a Decommissioning and Rehabilitation Plan to be included in the OMP. This will include inspections to demonstrate no evidence of soil contamination or waste remaining as a result of activities. • Potential impacts to sensitive receivers within the adjacent Recreation Zone include noise, light, visual intrusion and construction impacts. These impacts are given detailed consideration in the EIR and reflected in the SOE with appropriate assessment criteria and leading performance criteria. There were a number of submissions received from concerned residents in the Burra community, as outlined in the Engagement Plan. The applicant outlined a number of actions that will take place to address concerns raised, including: – Prior to commencement a CEMP, Decommissioning and Rehabilitation Plan (DRP) and OMP will be prepared. These will address the management of dust/air quality, stormwater, traffic/vehicle movement, flood mitigation, noise, erosion – and sedimentation and waste management. – A community engagement strategy will be implemented for the construction and operational phases of the project, detailing ongoing consultation with landowners and occupiers in the locality, Council and identified key local stakeholders (business and residents). – A stakeholder complaints will be register will be established and maintained. – Compliance with relevant environmental acts (including noise, waste, nuisance). – On site parking and manoeuvring is provided for all vehicles anticipated to use the site.	DHUD comments noted and there are No recommended actions as part of this commentary. It is a confirmation that relevant matters have been suitably addressed in the EIR and SEO.	No alterations to EIR or SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
3.3	Regional Plans: As outlined in the EIR the subject site is within the Yorke Peninsula and Mid Murray Regional Plan; the Landscape SA Northern and Yorke landscape region and the Flinders Lofty Block (FLB) bioregion and Broughton Association. Yorke Peninsula and Mid Murray Regional Plan Burra is a Supporting Service Centre and tourist destination that provides to surrounding rural areas and contributing to regional tourism, agriculture, and local business development. Burra's strategic location and historical significance will help strengthen connections across the Yorke Peninsula and Mid North, supporting broader regional development. The site is identified in the plan for future tourism. An action is to finalise investigations and initiate a Code Amendment that will assist in unlocking potential tourism development in Burra. The land is also listed in the Plan as Native Title claims; Native Title register and well as other environmental indicators (water resources, climate change, native vegetation). Landscape SA Northern and Yorke landscape region The landscape regions are administered by landscape boards, whose role is to administer the Landscape SA Act and define the priorities relevant to management of the natural resources of each region. Construction and operation activities undertaken under this EIR will need to align with the landscape management plans and policies for the Northern and Yorke landscape region.	DHUD comments noted and there are no recommended actions as part of this commentary. The Regional context of the site, the proposed development and the proposed future land use have been suitably addressed in the EIR and SEO.	No alterations to EIR or SEO are required.
3.4	State Planning Policies: The proposal relates to State Planning Policy 9 (Employment Lands). Providing a suitable supply of land for employment uses is critical to support job growth and the economic prosperity of communities. The planning system needs to support the diversification of our economy and remove barriers to innovation. It is critical that the right signals are sent to the market to attract interest, investment and tourism opportunities across South Australia. Various other SPPs are relevant including SPP 4 which seeks to maintain and enhance South Australia's biodiversity and life supporting functions. The impact of the development on native vegetation and biodiversity will be considered under the *Native Vegetation Act 1991* and *EPBC Act 1999*.	DHUD comments noted. An application for Native Vegetation clearance has been submitted to Native Vegetation Council and is currently being determined. The need to obtain a native vegetation clearance is adequately and appropriately addressed in the EIR and SEO, including Biodiversity Impact ID #BIO01 and SEOBJ#3.	No alterations to EIR or SEO are required.
3.5	On 13 February 2025, the Minister for Planning (pursuant to Schedule 6A, Clause 1(2) of the *Planning Development and Infrastructure (General) Regulations 2017*) approved the request for temporary workers accommodation on the southern portion of Lot 474 Government Road and 7259 Barrier Highway at Burra (Aberdeen Oval). This made the application Accepted development with no planning assessment required. The PDI only allows this for a period of 2 years for temporary workers under Schedule 6A. It is understood that the site is expected to be used for this activity for up t5 years and therefore approval is being sought under the HRE Act.	DHUD comments noted. As the proposed workers accommodation facility is proposed to be utilised for a period exceeding 2 years, the accepted development declaration could not be utilised and approvals have been sought.	No alterations to EIR or SEO are required.
4.0	**Aboriginal Affairs and Reconciliation (Attorney General's Department) (AAR)**		
4.1	Aboriginal Affairs and Reconciliation (Attorney General's Department) (AAR) has reviewed the relevant documentation for the project (SEand EIR). AAR notes a key objective of the project (OBJ 4) is to 'minimise disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places'. In doing so AAR notes the following from the EIS: • that the project footprint is in an already cleared and disturbed area of land; • that the Regional Council of Goyder (RCG) has requested a search of AAR's central archives, which did not identify any Aboriginal heritage in the proposed project footprint (plus a 50m buffer); • that RCG has developed a Cultural Heritage Management Plan in consultation with the Ngadjuri community (via the Ngadjuri Nation Aboriginal Corporation); • RCG's commitment to ongoing engagement with NNAC during project development and works; and • RCG's commitment to adhere to the provisions of the *Aboriginal Heritage Act 1988* (SA) (AH Act) and comply with the Aboriginal Heritage Discovery Protocols (including both sites and ancestral remains' protocols) should heritage be uncovered during project planning or project works.	AAR comments noted. Since preparing the June 2026 EIR, further engagement has been undertaken with Ngadjuri Nation Aboriginal Corporation (NNAC) and a draft Cultural Heritage Survey Report prepared. As per existing commitment and recommendations of the survey report, there will be ongoing engagement with NNAC. Minor wording alteration to EIR Socio-Economic -Aboriginal and Non-Aboriginal Heritage Impact ID # SE01 to delete reference to the development of a Cultural Heritage Management plan, as this plan has not been recommended by NNAC in the Cultural Heritage Survey Report. Heritage discovery protocols are included in EIR Socio-Economic -Aboriginal and Non-Aboriginal Heritage Impact ID # SE01; and also in CEMP, DRP and OMP.	Minor wording alteration to EIR Socio-Economic -Aboriginal and Non-Aboriginal Heritage Impact ID # SE01 to reflect the Cultural Heritage Survey Report.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
4.2	Given the attention to detail to Aboriginal heritage management for the Aberdeen Oval; the absence of known heritage sites in the project footprint; and RCG's commitment to adhere to the AAR's Protocols, AAR raises no concerns with the proposal from an Aboriginal heritage management perspective. However, noting that NNAC has not yet accepted the offer of a site survey, AAR urges RCG to continue to approach the Ngadjuri community/NNAC with an offer to participate in a heritage survey/walkover of the project footprint; prior to Project works occurring. Undertaking a survey of this nature is the most effective way to mitigate any potential damage to heritage.	As above, walkover and survey undertaken by NNAC. The draft Cultural Heritage Survey Report does not identify sites within the boundary of the proposed workers accommodation facility, but does identify the importance of Burra Creek. Should any infrastructure associated with the workers accommodation facility be proposed adjacent the creek (within 30 metres of the centreline) then ongoing consultation will be undertaken with NNAC and adherence to the Cultural Heritage Survey Report recommendations, as stated in the EIR Socio-Economic -Aboriginal and Non-Aboriginal Heritage Impact ID # SE01.	No alterations to EIR or SEO are required.
4.3	Please find attached a copy of AAR's Aboriginal Heritage Protocols that applies where there is no authorisation under the AH Act. AAR notes further that, in the event of a discovery of Aboriginal sites, objects or remains, in addition to stopping works, section 20 of the AH Act requires the discovery to be reported to the Minister, as soon as practicable.	Aboriginal Heritage Protocols noted and these will be referenced in CEMP, DRP and OMP. SE#OBJ4 addresses Aboriginal Heritage protocols.	No alterations to EIR or SEO are required.
5.0	**Department of Primary Industries and Regions (PIRSA)**		
5.1	Page 11 of the SE- PIRSA supports the early development of an effective economic benefit sharing strategy by the operator of the workers accommodation facility to support achievement of *Objective 5 to support positive engagement of services with Burra Community.*	The Regional Council of Goyder, Neoen and Regional Development Authority are undertaking ongoing work in relation to the development of an Economic Benefit Sharing Strategy. A skills and services register have been prepared in consultation with local business. EIR Socio-economic Impact ID #SE02 and SEOBJ#5 support the positive engagement with the local community.	No alterations to EIR or SEO are required.
5.2	General comment - Particular emphasis should be placed on ensuring the ongoing procurement of food, supplies, services and other provisions from local businesses to support the worker accommodation facilities. This approach will maximise economic benefits for local businesses and the broader regional community, while also creating opportunities for enduring legacy benefits that extend beyond the life of the project. Regions supports the development in principle, noting the existing shortage of worker accommodation across the area. While the proposal may result in some reduced demand for neighbouring accommodation providers in the Clare Valley that currently service workers associated with wind farm and renewable energy developments, particularly during periods of lower tourism activity, the broader accommodation constraints in the region are well recognised.	Comments by PIRSA are noted and Council, Neoen and RDA are working on business connections. As discussed in EIR development of business connections will identify available skills and capacity from the local service providers. There continues to be utilisation of tourist/short term accommodation in the region for renewable energy project workers, other than Neoen's Goyder North wind farm project.	No alterations to EIR or SEO are required.
6.0	**Department for Environment and Water (DEW)**		
6.1	DEW does not have any major concerns with this proposal and has considered the following matter: • The project site is an unused oval, known as the former Aberdeen Oval, on the northern outskirts of the township of Burra and outside the boundary of the Burra State Heritage Area. • Impacts on heritage values for Burra have been thoughtfully mitigated through careful design to reduce visual impacts towards the State Heritage Area. • The inclusion of the Native Vegetation Clearance Data Report is acknowledged and appreciated. Separate to this, DEW understands that a native vegetation clearance application has been made by the applicant to the Native Vegetation Council, noting this is not a matter for DEW. • There are no significant biodiversity values or known threatened flora or fauna species recorded at the project site. • Minor amendments to the environmental objectives are recommended to strengthen non-Aboriginal heritage protection and climate change resilience. • Flood mitigation measures for the neighbouring Burra Creek have been carefully considered by the applicant. DEW acknowledges these efforts and supports the use of more recent data and flood mapping. • The project site is not located within a protected water resources area and there is no intention to access native water for this proposal. DEW has recommended an existing well on the subject land be investigated to exclude groundwater impacting activities.	Noted.	No alterations to EIR or SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
6.1	Has the applicant adequately described the existing environment, as far as this is relevant to the proposed operations? The Department for Environment and Water (DEW) notes and recommends the following:	-	-
6.1.1	**Biodiversity** The applicant has adequately described the existing environment in the Environmental Impact Report (EIR) and DEW concurs that the footprint of the temporary workers accommodation does not contain significant biodiversity values. DEW acknowledges and appreciates the inclusion of the Native Vegetation Clearance Report in the EIR.	Noted.	No alterations to EIR or SEO are required.
6.1.2	**Native Fauna** The environmental description in the EIR was primarily informed by public databases and the applicant's technical assessment. Aside from this desktop review and assessment, only a single field visit was undertaken over one day during summer (in February 2025), when not all flora and fauna species may have been present or readily detectable. Further consideration of the existing environment may be required in the future, separate from this project, should the applicant proceed with its longer-term plan to relocate the caravan park to this site. If the caravan park footprint is expanded beyond the currently proposed development area, additional assessment may be required for less mobile listed species known to occur within 5 km of the site, including the Pygmy Blue-tongue Lizard and Flinders Ranges Worm Lizard.	Umwelt (accredited native vegetation consultants) attended the site in February 2025 and this informed the preparation of the NVC Data Clearance report. Ecologist from Umwelt are highly experienced in identification of species such as the Pygmy Blue-tongue Lizard and Flinders Ranges Worm Lizard, which may occur within a 5km radius of the site. The likelihood of the site providing suitable habitat for Pygmy Blue-tongue Lizard or Flinders Ranges Worm Lizard is considered low given the degraded nature of the site and the previous active recreation land use. It is acknowledged that should the subject land, or a larger/adjacent area be proposed for a caravan park/tourist accommodation in the future, a further assessment may be required.	No alterations to EIR or SEO are required.
6.1.3	**Water Resources** Burra Creek is situated to the south and west of the development site and discussed in terms of potential flood risk in the EIR. There is potentially an underground water well located on the proposed development site that may need to be considered to be properly maintained or capped. Well unit number 6630-03872 appears on our records as being located on Certificate of Title 5739/534 (the subject land) between the former Aberdeen Oval and the Burra Creek issued under Well Construction Permit Number 358411, drilled on 24 March 2020 with a depth of 67m.	Flood management is a matter for further consideration and resolution in the final design. Information from the WaterConnect website confirm that the well is located on CT 5739/534. The exact location of the well is identified as 306561.7 easting and 6272767 northing (MGA 54). The well is located south of the existing golf club storage buildings, as shown on the images below. The well is located outside of the site of the development for the temporary workers accommodation facility. A note is included to identify the well on the final plans as a control measure in the EIR - Landform and Water Quality: Impact ID #LF&WR03.	Note included to identify the well on the final plans as a control measure in the EIR Landform and Water Quality: Impact ID #LF&WR03

Unit numbers 6630-03872 ☐ **Include wells within a** 1.000 km **Search**
radius.
e.g. 6529-119, 6529-120

Filter hide

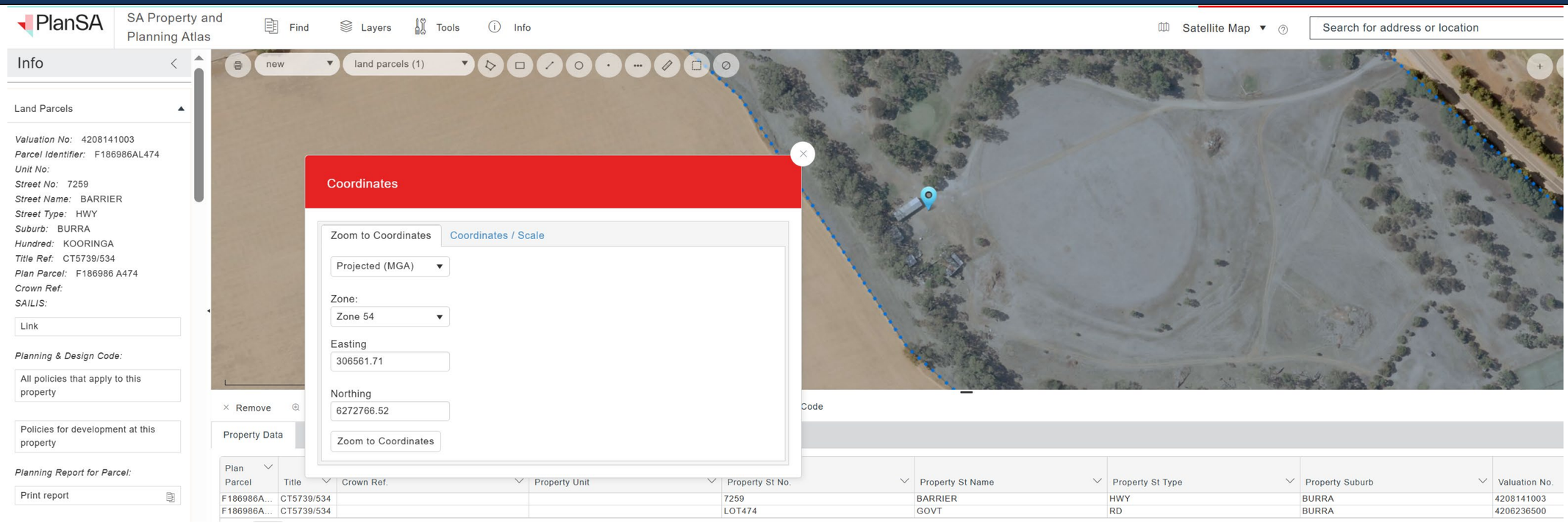
- **Drilled date** Any
- **Well depth** Any
- **Purpose** Any
- **Aquifer** Any
- **Parameter Measured**
- **Obswell Parameters** Any
- **Status** Any
- **Prescribed Wells Area** Any
- **Prescribed Water Resources Area** Any
- **NRM Region** Any
- **Class** Any
- **Water Chemistry** Any
- **Must contain** Any

1 well found. **Download Data** **Print Data** **Map Layers** **Legend**



Detail	Unit No	Obs No	Obs Network	Permit No	Date Drilled	Max Depth (m)	Latest Depth (m)	SWL (m)	SWL Date	SWL Status	Yield (L/sec)	Yield Date	TDS (mg/L)	TDS Date	Salinity Status	Purpose	Aquifer	Status
Details	6630-3872			358411	24/03/2020	67.00	67.00	9.80	24/03/2020		4.000	24/03/2020				STK	Nms	

Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO



6.1.4	Flood Based on the 1% AEP flood inundation map available in the Burra Storm Water Management Plan, there is a high likelihood that Aberdeen Oval would be inundated by overflow from Burra Creek. This issue is already highlighted in Section 4.6.2 of the EIR. Further information is provided below under the section “potential impacts on the environment”	Noted. A Hazard Management Plan and a flood mitigation strategy will be included in the OMP. It should also be noted that the Regional Council of Goyder is the licence holder, landowner and Local Government Authority as it relates to the subject land. In addition to the management requirements incorporated in the EIR and SEO associated with the proposed temporary workers accommodation facility, the Council has significant responsibilities under the Local Government Act for the management of hazards for its community, which includes both flood and stormwater management. The State-wide Flood Hazard Overlay Code Amendment, currently on consultation seeks to use contemporary flood hazard modelling to update spatial application of the Code’s flood hazard overlays to realise greater consistency in flood hazard identification across local government area boundaries. Updated mapping as it relates to the subject land is illustrated below. Currently the site of the proposed temporary workers accommodation facility is subject to the Hazards (Flooding – Evidence Required) Overlay. The State-wide Flood Hazard Overlay Code Amendment would reduce the area of potential flooding to that shown in yellow in the image below, which would be incorporated in the Hazards (Flooding - General) Overlay. Flood risk has been modelled and spatially applied, as part of the Code Amendment, based on AEP and hazard classification levels published by AIDR and categorised into tolerable and intolerable flood risks. H1-2 for 1% AEP and H1 for 5% AEP is categorised as a potential for tolerable flood risk, subject to the risks being reduced as low as reasonably practicable. H3-6 for a 1% AEP and H2-6 for 5% AEP is categorised as potential for an intolerable flood risk with actions being required to avoid or reduce the risk. H2 has been included in the 5% AEP given this is	Additional wording included in Section 4.6 of the EIR in relation to the State-wide Flood Hazard Overlay Code Amendment.

Summary of Submission		Discussion and Response	Reference to Response in EIR/SEO
		subject to more frequent flood events. **Flood hazard classification** **H1** **H2** **H3** **H4-6** **Likelihood** **1% AEP** **5% AEP** **Legend** Tolerable flood risk Intolerable flood risk **Table 1**: Matrix showing flood hazard classiciation level and liklihood to draft flood hazard overlays Tolerable flood risk has been spatially applied under the Hazards (Flooding – General) Overlay and potential for intolerable risk under the Hazards (Flooding) Overlay. Portion of the site of the temporary workers accommodation facility (as illustrated below) is within a tolerable flood risk area.	
			
6.1.5	Stormwater Stormwater is adequately addressed for the proposed temporary accommodation and DEW has no concerns at this stage.	Noted.	No alterations to EIR or SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
6.1.6	**Heritage – Non-Aboriginal** The EIR adequately describes the heritage values of the area, including recognising Burra's status as a State Heritage Area and National Heritage Place, and the inclusion of the Australian Cornish Mining Sites at Burra and Moonta on the World Heritage Tentative List. It is noted that Aberdeen Oval is within the township of Burra although outside of the Burra State Heritage Area.	Noted.	No alterations to EIR or SEO are required.
6.2	Has the applicant adequately identified the potential impacts on the environment that may arise from the proposed operations? DEW notes and recommends the following: • DEW note that the applicant has thoroughly addressed the avoidance, reduction and management of impacts on the environment through: • all phases of the regulated activities including construction, operation and decommissioning and rehabilitation were considered when identifying the environmental elements; and • approved management plans, incorporating best practice appropriate protocols, procedures will be developed and controls put in place.	Agreed.	No alterations to EIR or SEO are required.
6.2.1	**Biodiversity** The development footprint of the temporary workers accommodation does not contain significant biodiversity values, and no substantial impacts are expected. As described above under the section "Existing Environment" further consideration and assessment may be required in the future if the caravan park footprint is expanded beyond the currently proposed development area.	Noted. Refer 6.1.2 above.	No alterations to EIR or SEO are required.
6.2.2	**Native Fauna** Whilst there is no recorded presence of NPW listed native fauna onsite, native fauna may access the site where these potential impacts can be adequately addressed to include the management of native fauna and mitigation of risks. These risks include native fauna that may access the site or be at risk of injury due to collisions with vehicles or entanglement with fencing or infrastructure. It is understood that appropriate protocols, procedures and other controls will be in place and incorporated into management under best practice. It is recommended that during each stage of the proposed development and any investigations or assessment on the project site, should the applicant need to catch, move, relocate or destroy any protected animal or eggs, the applicant is required to apply for a permit under South Australian legislation to DEW.	Noted. Procedures and protocols relating to catching, moving, relocating or destroying native fauna is most appropriately included in the Flora & Fauna Management Plan (FFMP).	No alterations to EIR or SEO are required.
6.2.3	**Water Resources** It is noted that native water is not expected to be impacted by this proposal, and external sources of water will be used for potable water and water for construction. Should there be a need for underground water use, a well construction permit may be required pursuant to the *Landscape South Australia Act 2019* (Landscape Act). Please contact the DEW Water Licensing Branch on (08) 8372 7561 for advice regarding matters concerning underground water authorisations (see more contact details in below section), this is also required to be included in the EIR. In regard to maintenance of wells, under section 119 of the *Landscape South Australia Act 2019*, there is an obligation on the occupier of land on which a well is situated to ensure that the well is properly maintained, this includes the casing, lining, and screen of the well and the mechanism (if any) used to cap the well. DEW advises that wells that are not correctly maintained can result in groundwater impacting activity that have a negative effect on the environment. It is noted that Well unit number 6630-03872 is located on the subject land although unsure if this is on or near the proposed development footprint which requires clarification by the applicant further discussion with DEW if this is the case.	There is no proposal to utilise underground water for the temporary workers accommodation facility, rather potable water will be utilised for construction and operation. The need to maintain a well is noted. The exact location of Well unit number 6630-03872 is being determined. Whilst on the subject land (CT) it is anticipated that this is located outside of the site of the development for the temporary workers accommodation facility. As per 6.1.3 above the need to identify the well on final plans is now included in the EIR.	As per 6.1.3 above.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
	Whilst the proposed development may not necessarily present a groundwater impacting activity with respect to the resource, DEW has experienced that legacy well locations can present a risk pathway for contamination dispersion during both construction and operation if they remain in place. DEW recommend that a well audit be conducted on site and potentially also the immediate vicinity to gauge an up-to-date record on the status, condition, and use of reported well infrastructure and to plan for remedial or mitigation activities, if necessary, prior to construction. DEW also recommend that results of well auditing be reported to DEW for record -keeping purposes. Please note that remedial action may require a permit and the applicant is advised to contact DEW Water Licencing for advice. A well construction permit is required for any works on wells that involves drilling, plugging, backfilling or sealing of a well, or repairing, replacing or altering the casing, lining or screen of a well.		
6.2.4	**Flood** As described in the above section for "existing environment", there is a high likelihood that Aberdeen Oval would be inundated by overflow from Burra Creek which has been highlighted in Section 4.6.2 of the EIR. It is evident that much consideration has already been given by the applicants in relation to flood management. DEW reinforces that effective flood mitigation measures will be required to be managed for the proposed development site, and the following considerations are recommended for both temporary and permanent facilities: • The current flood inundation mapping is based on 2012 catchment hydrology, 2006 Census population data, 2016 IFD design rainfall data, and the Draft Climate Change and Natural Resources Management Plan (January 2011). Many of these inputs have since been updated. Revised flood inundation mapping using contemporary datasets is therefore required to support reliable flood mitigation planning. • Potential improvements or deficiencies in the stormwater network should be assessed and incorporated to ensure the system is accurately represented during a flood event. • it is also important to assess the potential impacts on the surrounding area once mitigation measures are implemented for the temporary workers' accommodation facility/permanent structures, particularly any changes to flood behaviour around Aberdeen Oval. DEW releases Climate projections that are relevant.	Section 4.6 of the EIR has been updated to include discussion regarding the State-wide Flood Hazard Overlay Code Amendment. This Code Amendment utilises current inundation mapping and data as referenced by DEW.	As per 6.1.4 above.
6.2.5	**Stormwater** Whilst DEW has no specific stormwater concerns at this stage, DEW is aware that the Councils longer term plan for the site is to re locate the caravan park, which would likely introduce permanent structures and accommodation. DEW therefore suggests that the stormwater basin should be sized using the most up to date Australian Rainfall and Runoff guidance, including consideration of how future climate change may affect rainfall intensities.	Noted. It is the objective that the engineering design for the temporary workers accommodation facility will undertake appropriate calculations for sizing, based on AR&R guidelines.	No alterations to EIR or SEO are required.
6.2.6	**Heritage - Non-Aboriginal** The proposed development may affect views towards Burra when approaching the State Heritage Area from the west. Although the site is located outside the State Heritage Area, the EIR recognises Burra's visual setting as a heritage value in Sections 4.7.4 (European Cultural Heritage) and 4.11.3 (Visual Amenity).	Noted.	No alterations to EIR or SEO are required.
6.2.7	**Native Vegetation** DEW notes that the applicant has applied to the NVC for clearance native vegetation which is being considered by the NVC.	Noted. The outcome of the NVC application should be known by the end of July or early August 2026.	No alterations to EIR or SEO are required.
6.3	**Are the proposed environmental objectives acceptable?** DEW notes and recommends the following: • The environmental objectives described in the SEO are comprehensive and generally well-articulated. However, DEW recommends the following minor amendments in relation to prescribed acts under its administration:	Amend SEObjective #4 tread: No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places unless authorised under the relevant legislation. This wording is more consistent with licence conditions. Greenhouse gas emissions have not been identified as an environmental impact for this development. The potential impacts for this temporary use do not warrant new or additional requirements to be included in the SEO.	Amend SEOBJ#4.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
	– No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places unless authorised under the relevant legislation – Minimise greenhouse gas emissions during construction, operation, decommissioning and rehabilitation phases		
6.4	Are the proposed mitigation measures practical and likely to achieve the desired objectives?	-	-
6.4.1	**Native Fauna** Mitigation measures are practical, and control measures are thorough related to impacts on fauna management, for example it was pleasing to see the inclusion in #BI002 "Presence of personnel, vehicles, noise and vibration during the regulated activities impacts local fauna" to limit the speed of vehicles in internal driveways. DEW notes that management plans will be developed incorporating relevant assessments and procedures and recommendations to incorporate the following if not already considered: Add details relating permits required to catch, move, relocate or destroy any protected animal or eggs in the mitigation measures and within relevant management plans during each stage of the proposed development and any investigations or assessments on the project site.	Details relating to permit requirements relating to native fauna is appropriate within the Flora and Fauna Management Plan (F&FMP). Further reference to the need to obtain permits is now included in EIR Biodiversity Impact ID# BIO01 and SEOBJ#3. The additional wording included is: F&FMP to reference permit requirements required to catch, move, relocate or destroy any protected animal or eggs.	Amend EIR Biodiversity Impact ID# BIO01 and SEOBJ#3 with additional wording to require the F&FMP to detail permit requirements.
6.4.2	Heritage - Non-Aboriginal It is noted that the EIR discusses mitigation measures for the impacts on heritage under EIR Section 4.11.3 Visual Amenity, demonstrating how the subject site has been designed to reduce its visual impact on views towards the State Heritage Area. These include: • The site is low-lying and not elevated, significantly reducing its visibility from surrounding areas. • The northern portion of the subject land is used as a golf course and contains extensive vegetation, which provides effective visual screening. • The subject land adjoins Burra Creek, where mature vegetation further softens views of the site and integrates it into the surrounding landscape. • Established mature vegetation along the Barrier Highway frontage provides an additional visual buffer, minimising the perception of development from key public viewpoints. • The proposed site will be temporary (18 months) for use only while workers accommodation is required. • Buildings are low in scale and centrally positioned to limit their visibility. It is further noted that EIR Section 5.2.4.5 Noise and Vibration has responded to DEW, Heritage S A previous request f or monitoring of vibrations and possible impacts to historic structures in the State Heritage Area.	Noted.	No alterations to EIR or SEO are required.
6.5	Are the proposed assessment criteria suitable to demonstrate achievement of the proposed objectives? As recommended above in the "Environmental Objectives" section and "Mitigation Measures" sections above, DEW recommends updating the SEand EIR to include amendments to the environmental objectives (which relates to the objectives for *Heritage- Non-Aboriginal* and an addition objective related to *Climate Change*) and ensure the associated risk assessment criteria, leading performance criteria and control and management strategies are then adequately addressed in line with this.	Refer 6.2.4 and 6.3 above. Given the nature of the proposed facility and its temporary timeframe of 5 years, detailed analysis of impacts of climate change are not considered warranted.	Refer 6.2.4 and 6.3 above.
6.5.1	**Native Fauna** In the EIR, Section 5.2.2 "*Biodiversity*", Table 5.2.2.1 "*Setting the Context – Biodiversity*", DEW recommends amending the "Applicable Non-Legislated Standards" column to included or refer to the following codes of practice for humane destruction of wildlife where relevant for any injured native animal on site which is located at: https://www.environment.sa.gov.au/topics/animals-and-plants/animal-welfare/codes-of-practice/codes-of-practice-humane-destruction-wildlife	Reference in Table 5.2.2.1 to DEW Code of practice now included. It is not considered appropriate to list each document and its weblink as part of the EIR, rather this information is more appropriately included in the Flora and Fauna Management Plan (F&FMP).	Amend Table 5.2.2.1 of EIR to reference DEW Codes of Practice.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
	Native Birds - https://cdn.environment.sa.gov.au/environment/docs/cop_humanedestructionbirds.pdf Wombats – https://cdn.environment.sa.gov.au/environment/docs/cop-wombat-2018.pdf Common brushtail possum – https://cdn.environment.sa.gov.au/environment/docs/cop_possum.pdf Flocking birds - https://cdn.environment.sa.gov.au/environment/docs/cop_flockingbirds.pdf Kangaroos and Wallabies – https://cdn.environment.sa.gov.au/environment/docs/code-of-practice-kangaroos-wallabies-non-commercial.pdf The Animal Welfare Act 1985 can be referred to if there is not a relevant code on DEW's website and additionally advice for management of wildlife can be referred to within Table 5.2.2.1 with a link to the DEW's website advice located at https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife and species specific information on the native fauna including: Grey-headed flying foxes - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/grey-headed-flying-foxes Snakes – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/snakes Possums – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/possums Wombats - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/wombats Little Corellas - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/little-corellas		
6.5.2	Water Resources Well maintenance - Consider amending the Assessment Criteria in relation to obligations under the Landscape South Australia Act 2019 to maintain underground wells as well as to carry out an audit for well/s on or near the subject land and development footprint and contact DEW in regard to responsibilities to maintain, backfill or cap. Please see contact details below for DEW Water Licensing and Driller Inspector contacts.	A "well" has been added as a potential receptor to EIR Landform and Water Quality Impact ID # LF&WR01.The Regional Council of Goyder as the land owner and Local Government Authority are aware of the requirements to maintain the well. However, an additional management is required in the EIR and SEOs the well is outside of the site of the temporary workers accommodation facility and the well will not be utilised or directly impacted by the project.	Amend EIR ID # LF&WR01.
6.5.3	Heritage – Non-Aboriginal As detailed above in the "Environmental Objectives" section, DEW has recommended to strengthen the objective related to Heritage as follows: "**No** damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and **places unless authorised under the relevant legislation"** It is further recommended that assessment criteria and associated Leading Performance Criteria be strengthened to mitigate risks for historical heritage/archaeology, including: • Completion of supporting heritage impact assessment. • Development of an OMP with project specific management and mitigation measures: – All workers to undergo historical heritage/archaeology site inductions – Implementation of an unexpected historical heritage discovery procedure (stop work, engage archaeologist to assess significance of the find, and recommence work only once authorisation received from the archaeologist) – Immediate reporting if a site/object of heritage significance is disturbed without appropriate permit/approval – Reporting of any other event where unknown historical heritage is discovered.	A Cultural Heritage Survey Report has been prepared in a draft and will be completed prior to construction commencing. In relation to non-Aboriginal heritage, the preparation of a heritage impact assessment is not considered warranted, given the nature of the development. The suggestion for additional wording relating to historical heritage/archaeology is acknowledged and additional wording including in the control measures of EIR Socio-Economic -Aboriginal and Non-Aboriginal Heritage Impact ID # SE01. It is considered the site discovery protocols would be included in the CEMP, OMP and DRP.	Amend EIR Socio-Economic -Aboriginal and Non-Aboriginal Heritage Impact ID # SE01 and SEOBJ#4 to reflect updated wording.
7.0	**Northern and Yorke Landscape Board (NYLB)**		
7.1	Native flora and fauna: The Board welcomes the inclusion of a Flora and Fauna Management Plan to be developed as part of the proposed project.	Flora and Fauna Management Plan (FFMP) for inclusion in the CEMP, SOMP and DRP referenced in EIR Biodiversity Impact ID #BIO01.	No alterations to EIR or SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
7.2	Impacts to Burra Creek: The Board appreciates the response to our previous correspondence regarding seemingly conflicting information in the EIR about potential impacts to Burra Creek. This stated that the EIR seeks to anticipate potential impacts to the Creek without the knowledge of the final design of flood mitigation and stormwater management (page 172). These works have the potential to significantly alter the level of impact that the proposed project has on the surrounding environment, and therefore without this information, the Board cannot conclusively comment on the impact of the proposed project. We do however, note that the intent is to minimise or avoid impacts to surface water in the Creek. Any clearance of high-quality native riparian vegetation around Burra Creek will require additional Native Vegetation Council (NVC) clearance approval, as this was not included in the initial Native Vegetation Clearance Data Report developed by Umwelt or application submitted to the NVC. As already acknowledged in the SEand EIR, the project proponent may also need to engage with the Board regarding a Water-Affecting Activity (WAA) permit as per the Board's WAA Control Policy.	The intent of the development continues to be the minimisation of impacts on Burra Creek. Upon final design of the workers accommodation facility, engagement will occur with NVC (if/as required) in addition to the current NVC application; and with NYLB should a water affecting activity be proposed. The EIR and SEO clearly acknowledge potential impacts on Burra Creek, including EIR Landform and Water Quality Impact ID # LF&WR01 and SE(OBJ#1). Native vegetation clearance is referenced in EIR #BIO01 and #BIO02 and SEOBJ#3.	No alterations to EIR or SEO are required.
7.3	Weed management: The Board welcomes the inclusion of a Weeds and Pests Management Plan to be developed as part of the proposed project, and the inclusion of the removal of Alepppines (Pinus halepensis) in the Decommissioning and Rehabilitation Plan. The Native Vegetation Clearance Data Report developed by Umwelt and included as Attachment C in the EIR, notes the presence of silver-leaf nightshade (Solanum elaeagnifolium) at the project site. This is, however, not included in the listed weeds in Section 4.5.1. (page 37) of the EIR. Silver-leaf nightshade is a Weed of National Significance and under the Landscape SA Act 2019, landholders are legally required to control infestations on their property, prevent the plant from spreading and avoid transporting or selling the weed. The Board recommends control measures be undertaken as per the PIRSA website and its inclusion in the Weeds and Pests Management Plan alongside the other Declared Plants identified at the site. Landscape Board staff are available to provide advice regarding the management of these weeds, if needed.	Silver-leaf nighshade has been added to the list of weed species in Section 4.5.1 of the EIR. Preparation of the Weeds ad Pests Management Plan would refer to current and available resources, including PIRSA and NYLB. It is not considered necessary to specify these sources in the EIR.	Silver-leaf nightshade (Solanum elaeagnifolium) added to Section 4.5.1 of the EIR.
8.0	**SA Country Fire Service (CFS)**		
8.1	The CFS supports the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO), noting that both documents incorporate advice provided by the CFS during the consultation phase.	Noted.	No alterations to EIR or SEO are required.
8.2	The CFS reiterates the importance of ensuring that the proposed site layout appropriately reflects the fire safety requirements of the National Construction Code (NCC). While these matters fall within building rules and are not specifically determined by the CFS, they may nonetheless influence site planning and should be considered early to avoid future design constraints.	Noted. Building fire safety aspects will be considered as part of the final site layout and design. Compliance with the National Construction Code is noted in EIR Amenity and Safety – Hazards – Fire: Impact ID #AS05 and SE#OBJ 8 and 10.	No alterations to EIR or SEO are required.
8.3	The CFS looks forward to providing further advice during the detailed design phase. Additional input at that stage may necessitate amendments to the site layout to ensure that bushfire safety considerations are adequately addressed.	Noted. The detailed design phase will commence following the grant of the licence and if/as required advice from CFS will be sought.	No alterations to EIR or SEO are required.
Public Submissions			
9.0	**M Bolman**		
9.1	The proposed location is not acceptable, it provides no benefit to anyone other than the owners of the project. A shanty town should be built on site at the wind farm not in Burra.	Acknowledged that some community members may not consider the former Aberdeen Oval site as being appropriate. The development is not considered to be a "shanty" town, but rather a planned facility with a temporary life span. Council has received feedback from the community and local business that has questioned whether Burra township is receiving adequate economic benefit from the increased level of activity and people in the area from renewable energy projects.	No alterations to the EIR/SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
		Whilst there maybe options for workers accommodation facilities to be located on the site of the wind farm, Neoen and Council consider that location of the facility within Burra is more beneficial to the community in terms of local businesses/service provides being able to supply goods/services, be engaged in employment and the general spending and level of activity of workers within the community. Aberdeen Oval has been selected as an appropriate location for the temporary workers accommodation facility for the following reasons: • The land is in the ownership of the Regional Council of Goyder and the AIL will be held by Council, which will provides ongoing oversight of the management of the site. • The site is of a physical size to be able to accommodate up to 400 workers with appropriate vehicle access and appropriate augmentation of infrastructure, without adverse visual impacts on Burra. • The proposed use is for a limited time (5 years), which allows development to occur in the future at the conclusion of this use. Council's strategic planning has identified that Aberdeen Oval is a site that would be appropriate for a future caravan park/tourist accommodation and the use for workers accommodation is an appropriate interim form of development. • The site of the facility is within an area that is underutilised and does not currently provide active recreational facilities. • The recreational and community facilities on the subject land, namely the tennis club, golf club and revegetation facilities are able to continue in conjunction with the proposed workers accommodation facility. • The location of the facility in close proximity to Burra. The proximity provides economic opportunities to the community via additional people within the region and anticipated expenditure in local businesses. • The location of the facility is on the outskirts of Burra without being located adjacent a significant number of sensitive receivers. • The site is outside of the boundaries of the State Heritage area which covers a large portion of the Burra urban area. • The temporary workers accommodation facility can be appropriately designed to minimise visual impacts. • Long term some of the physical infrastructure provided for the temporary workers accommodation facility will remain on the site and would provide long term benefits should the Council's strategic objective for a future caravan park be pursued. • Provision of a dedicated temporary workers accommodation facility will reduce impact of workers utilising tourist accommodation. At times, the use of tourist accommodation for workers has a detrimental impact on the very important tourism industry in and around Burra and the wider region (Clare Valley).	
9.2	The use of the Barrier Highway is a problem, that section is poorly maintained, and has no shoulder. It is the only bicycle route between Burra and the Midnight Oil house, the increase in traffic is not acceptable without a properly constructed bicycle lane.	The proposed development will result in an upgrade to Barrier Highway in the vicinity of Aberdeen Oval. The upgrade is detailed in the Traffic Impact Assessment (TIA), which is attached to the EIR, and is subject to the approval from the Department for Infrastructure and Transport. The capacity of Barrier Highway to accommodate the anticipated vehicle movements has been assessed in the TIA and considered appropriate and safe for all road users. The provision of a bicycle lane along Barrier Highway to the Midnight Oil house is outside of the scope of this development.	No alterations to the EIR/SEO are required.
9.3	There are currently 70 houses listed for sale on Gumtree in Burra and hundreds more in surrounding locations. If you need accommodation, buy 100 houses and house your workers in those.	Data available from realestate.com.au, as of 9 July 2026 indicates that there are 6 dwellings for sale in Burra. The suggestion that there is significant supply of dwelling in the region is not evident from data or Council and Neoen' experience. Furthermore, Council and Neoen do not seek to adversely impact the availability of dwellings for residents of Burra and surrounding areas by consuming all available housing stock.	No alterations to the EIR/SEO are required.
10.0	**Graeme Crook, Soil Cycle Biosystems**		
10.1	Expresses the opinion that the SEO is "fundamentally about trust. Trust that land and water will be protected amenity and heritage values will be respected fire, flooding, contamination risks will be managed, services will cope the community will not bear disproportionate costs for a time-limited project".	It is considered that the EIR and SEO provide greater assessment and justification for management other than "trust".	No alterations to the EIR/SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
10.2	Extensive commentary included regarding the use of industrial hemp as a building material and its benefits.	The purpose of the EIR and SEO is not to examine alternate building materials.	No alterations to the EIR/SEO are required.
11.0	**Robert Perry**		
11.1	Support the proposed Temporary Workers accommodation. I believe the area to be a great site for caravans and camping, and believe that at the end of the project it should provide an opportunity for the appropriate rehabilitation and revegetation with a variety of local native species.	Noted. Revegetation of the site will be further detailed in the Decommissioning and Rehabilitation Plan.	No alterations to the EIR/SEO are required.
11.2	Experienced in working with the Burra Revegetation Group. Enclose a copy of the Burra Creek Work Plan prepared in 2024.	Note that the Burra Revegetation Group could be a resource for site rehabilitation in the future.	No alterations to the EIR/SEO are required.
12.0	**Russell Skinner**		
12.1	This infrastructure exists only tenable a project the community has not consented to The stated purpose of this camp is to support construction of Neoen's Goyder North Wind Farm. Over 300 residents have signed a petition (Appendix 1) opposing wind towers visible from the Burra township on heritage and landscape grounds. That none from Neoen or The Regional Council of Goyder has addressed. Approving associated infrastructure for a project of this scale, ahead of and separate from full assessment of the wind farm itself, risks entrenching the development as a fait accompli before the community's substantive objections have been properly tested.	Goyder North Wind Farm is a lawfully approved land use. It is acknowledged that the workers accommodation facility is to assist with the Goyder North project moving into construction. A petition opposing the visibility of wind turbines from Burra is not a matter to be considered or resolved as part of the AIL application for a temporary workers accommodation facility.	No alterations to the EIR/SEO are required.
12.2	Heritage and landscape impact on Burra. Burra is a state and nationally significant heritage town, and its setting — the open pastoral landscape surrounding it — is inseparable from that heritage value. A construction camp of this scale at the town's edge, servicing turbines that will be visible from the township, compounds the visual and character impact my petition addresses. This is not a neutral piece of infrastructure; it is the staging ground for the very development residents object to.	The heritage significance of Burra is extensively discussed in the EIR. Furthermore, the visibility of the temporary workers accommodation facility is assessed in Sections 4.7.4, 4.7.5 and 4.11.3 of the EIR. The proposed temporary workers accommodation facility application and associated EIR and SEO have been considered by the Heritage SA - DEW. In response to the draft EIR and SEO Heritage SA advised that the proposal would have an acceptable visual impact on the existing setting and any historic building located on the north/west side of the State Heritage Area.	No alterations to the EIR/SEO are required.
12.3	Council's conflicted position. The Regional Council of Goyder is a co-applicant on this AIL while simultaneously maintaining a public posture of neutrality on the wind farm itself, deferring to state planning processes rather than exercising its standing as a referral body to formally oppose the development. Co-sponsoring workers' accommodation for the project while declining to take a substantive position on the project's merits is inconsistent, and residents are entitled to know why the Council wants to be a centre for excellence for renewables without an explicit community mandate — including whether any councillors hold landholder lease agreements connected to the wind farm.	The Regional Council of Goyder are the applicant for the AIL. The Goyder North Wind Farm was an application which was determined by the State Commission Assessment Panel. Whilst Council was a referral agency as part of the application, they were not the planning authority. The matter of having a “community mandate” for renewable energy projects is not a matter for this AIL application. The Council, as the applicant for the AIL has undertaken open and genuine community consultation on the temporary workers accommodation facility. The land on which the temporary workers accommodation facility is proposed is Council owned land and has no bearing on any land ownership as part of the wind farm development.	No alterations to the EIR/SEO are required.
12.4	Regional and long-term use concerns. The notice states the camp will serve "regional needs in the longer-term" beyond the wind farm construction period. We all know what the council wants, they want to move the caravan park to this site after Neoen caravan has moved on with the benefit from councils’ point of view being the infrastructure is largely established by Neoen. This is a significant undertaking that deserves scrutiny in its own right. Why not be open and upfront instead of referring to it obliquely as “regional needs in the longer term.”	The EIR openly states that Council’s long term vision for the site is development as a caravan/tourist park. The EIR discusses that any proposed caravan/tourist park would be the subject of a separate development application and a Code Amendment to rezone the land. Retention of service infrastructure to the subject land at the conclusion of the temporary workers accommodation facility is seen as a benefit to the Council.	No alterations to the EIR/SEO are required.
12.5	Paucity of information in the documents used to support the workers Accommodation. Far from being a genuine inquiry to address concerns, these documents by Masterplan in service of their paymaster The Regional Council of Goyder seek to downplay, distract and divert community attention. The documents represent the death of democracy by dot point. Rather than illuminate they seek to cover over issues the same way that snow falls on cedar.	MasterPlan are the Regional Council of Goyder planning consultants and have been responsible for the preparation of the AIL documentation. The EIR and SEO documents are subject to community and Government Agency review and scrutiny. Should the documentation be found to be lacking, then the AIL would be at risk of substantial delay or refusal.	No alterations to the EIR/SEO are required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
12.6	The documentation references “the applicant as an experienced operator”. They mention this as though it's a good thing as though it is enough of a reason not to look closely at the experiences of other communities with this applicant. This is what you will discover with just a minimal research.	The requirements to undertake the development in accordance with the SEO falls to the licensee, which would be the Regional Council of Goyder.	No alterations to the EIR/SEO are required.
12.7	The next dot point to raise is the development “traffic management measures” in the assessment criteria its revealed in a laugh out loud moment that the criteria is the Road Traffic Act of 1961. Further in the text a little more is revealed, they going to construct a new entrance. That’s it. No mention how important it is for the township of Burra to have an articulated thoughtful traffic management strategy in place, especially given the 500 workers required for the construction of the proposed Bundey Data Centre and the impact of extra tourism from a successful UNESCO World Heritage bid. A meeting was called by council inviting all business to attend on the 18 November 2024. Of the 20 issues I put forward (and mine was the only submission) none have been implemented.	Traffic management associated with the temporary workers accommodation facility is considered in the Traffic Impact Assessment (TIA) prepared by MFY traffic consultants as part of the EIR. The TIA and the design of the proposed new vehicle entrance is being assessed by the Department for Infrastructure and Transport and will need to be approved as part of the development of the site for temporary workers accommodation facility. Traffic movements associated with world heritage bid and proposed data centres is outside of the scope of investigations of the AIL application. Cumulative impacts of traffic movements of multiple projects is a separate and distinct matter for the Regional Council of Goyder. Managing traffic movements associated with the temporary workers accommodation facility will be the subject of a Traffic Management Plan (TMP).The requirement to prepare a TMP is included in the EIR-Amenity and Safety – Hazards -Traffic: Impact ID #AS06.	No alterations to the EIR/SEO are required.
12.8	I ask that the Department: • Refuse the AIL, or defer determination until the underlying wind farm development application has been fully assessed and community objections addressed; • Require the Goyder Regional Council to disclose any conflicts of interest among elected members or staff connected to the wind farm; and • Publish all submissions received, as promised, and ensure this consultation is not treated as a formality ahead of a predetermined outcome.	As previously stated, the Goyder North Wind Farm is lawfully approved. This AIL application should not be delayed by community concerns regarding the Goyder North Wind Farm. Questions relating to conflicts of interest relating to the Goyder North Wind Farm are not relevant to the assessment of this AIL application. This summary is provided to DEM and pursuant to HRE Reg 39(5) the submissions and this response will be available for inspection on the HRE register. Previous submissions as part of the community consultation on the draft EIR and SEO in February/March 2026 were summarised in the Engagement Report (dated April 2026). The outcome of the project will be determined through the assessment of all documentation prepared and submitted to the Department for Energy and Mining. The decision to grant the AIL is for the Minister for Energy and Mining.	No alterations to the EIR/SEO are required.

Further information

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