

4 September 2026

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Planning and Building Division
Department for Housing and Urban Development

Submitted via PlanSA portal

Dear Fiona

Response to Representations – Application ID 26016431 – Osborne

Introduction

I write in response to the representations received for the above development application.

Summary of Representations

Two representations were received during public notification:

No.	Representor	Position	Wishes to be heard
1	Friends of Port River	Opposes	Yes
2	Port Adelaide Residents Environment Protection Group	Opposes	Yes

This letter provides a response to the items raised in the representations.

The representations raised the following matters:

- Coastal Hazards and Flooding
- Referral to Government Agencies

- Impacts on Mutton Cove Environment / Environmental Assessment
- Construction Environmental Management / Acid Sulphate Soils
- Decommissioning of existing infrastructure
- Vegetation and Tree Removal
- Laydown Area

Response to Representors

Coastal Hazards and Flooding

Representors raised concerns about coastal hazards and flooding.

The proposed site levels are based on detailed, site-specific TUFLOW flood modelling. They are not based on a generic coastal flood level. The modelling assessed both current and future conditions.

The current scenario adopted a mean high water springs level of 0.95 metres AHD. The future scenario adopted a level of 2.38 metres AHD and included sea level rise, land subsidence, storm surge and increased rainfall associated with climate change. Under this future scenario, the highest flood level modelled within the development footprint is approximately 2.45 metres AHD.

The hydrology assessment recommends a minimum site bench level of 2.75 metres AHD.

The post-development modelling incorporates a bench level of approximately 2.9 metres AHD, providing more than 300 millimetres of freeboard above the maximum modelled flood level.

The modelling demonstrates that the site will remain protected from external flooding and seawater inundation. The preliminary civil design also identifies a perimeter bench level of approximately 3.0 metres AHD, with the southern access road set at approximately 2.85 metres AHD.

The current concept design does not identify finished floor levels beyond these bench levels. This reflects the nature of the proposal, which primarily comprises a substation hardstand and associated electrical infrastructure rather than conventional buildings. Detailed design drawings will confirm levels for all relevant surfaces, structures and flood-sensitive equipment. These levels will be reviewed against the Coast Protection Board's requirements before construction.

The Coast Protection Board advised:

"The development should ideally comply with the Board's recommended levels. Where minimum finished floor levels are not achieved, the Board requires that all mechanical, chemical and electrical equipment vulnerable to water ingress be raised to a minimum level of 3.55 metres AHD."

The proposal can comply with this requirement. Any flood-sensitive mechanical and electrical equipment will be designed and installed to meet the Coast Protection Board's minimum level requirements. This can be secured through a condition of consent and documented in detailed design.

Referral to Government Agencies

Representors raised concerns about referrals to government agencies during the assessment.

Referrals were issued to:

- Port Adelaide Enfield: responded 12 August 2026
- Coast Protection Board: responded 25 August 2026
- Department of Energy and Mining: requested further information about development near pipelines

Port Adelaide Enfield and the Coast Protection Board have responded with comments. The Department of Energy and Mining requested further information about development near pipelines. A response to this request was provided.

The development has been referred to the relevant referral agencies. No other referrals are prescribed by the Code.

Impacts on Mutton Cove Environment

Both representors raised concerns about impacts on the Mutton Cove environment.

Concerns about the Mutton Cove seawall, coastal erosion, sea level rise and broader reserve management are acknowledged. These are existing issues that are independent of the proposal. Given the nature and location of the works, the development is not expected to materially increase these risks.

The balance of concerns raised appear to be based on a misunderstanding of the proposed works.

The proposal includes construction of the new Lefevre East Substation next to the existing Lefevre Substation. The new substation is located within an already disturbed

interface between utility infrastructure and industrial development. It is not located within an intact or high-value part of the Mutton Cove Conservation Reserve. Impacts on the environmental values of Mutton Cove are therefore limited. They can be managed through the proposed environmental management framework.

The proposal also does not involve a new transmission corridor through Mutton Cove. The project allows removal of the existing transmission towers, conductors and associated infrastructure that currently cross Mutton Cove.

The development will reduce the long-term infrastructure footprint within the conservation area. It will also remove the existing transmission line easement. Once the overhead transmission infrastructure is decommissioned and removed, affected areas will be revegetated and rehabilitated.

Construction impacts will be temporary. They will be managed through the Construction Environmental Management Plan and associated measures. These include erosion and sediment controls, soil management procedures and rehabilitation requirements. These measures will minimise impacts on surrounding vegetation, coastal habitats and environmental values during construction and decommissioning.

Decommissioning of existing infrastructure

Representors raised concerns about decommissioning the existing infrastructure.

The proposed decommissioning approach involves removing all above-ground tower and transmission infrastructure. It also includes excavating concrete foundations to about 1 metre below ground level. The remaining footing will be treated so it is safe and stable. The site surface will then be rehabilitated. Foundation elements below 1 metre below ground level will remain in situ. These deeper footings typically extend to about 10 to 15 metres below ground level.

Retaining the deeper foundation components will minimise ground disturbance, reduce environmental impacts, avoid substantial excavation and maintain land stability. This approach still meets the objectives of the decommissioning program. Removing the full footing depth would require extensive excavation. It would deliver little additional environmental benefit and cause greater disturbance to soils and landforms.

Following decommissioning, disturbed areas will be remediated through backfilling, compaction, topsoil replacement and revegetation with suitable native species. Rehabilitation and planting will occur in consultation with the Department for Environment and Water. This will help restore the site in a manner consistent with environmental and land management objectives.

Construction Environmental Management / Acid Sulphate Soils

Concerns about acid sulphate soils are acknowledged. The potential presence of acid sulphate soils is a recognised consideration for development in low-lying coastal environments. This has been considered through the project's environmental assessment.

That said, it is not a planning consideration. It is not a factor controlled by the Planning and Design Code. There is no statutory referral required to the EPA.

Notwithstanding this, earthworks will occur in accordance with the Construction Environmental Management Plan, Soil Management Plan and applicable environmental requirements. These measures provide procedures for identifying, handling and managing acid sulphate soils, if encountered during construction.

The potential occurrence of acid sulphate soils does not create an unusual constraint for the proposal. It can be managed through standard construction and environmental management measures.

Vegetation and Tree Removal

Representors raised concerns about differences between the Succession Ecology report and the URPS arborist report.

We acknowledge that there are inconsistencies between the two reports. These differences reflect a different approach to tree identification, classification and assessment.

The Succession Ecology report was prepared to identify trees on the site. However, it did not include the notional root zones or structural root zones required to assess development impacts. This meant impacts on trees could not be determined. The report therefore provided no assistance to the planning assessment of the development.

A subsequent Arboricultural Impact Assessment was therefore required. URPS prepared this assessment using the final development plans. The assessment identified affected trees, established applicable tree protection zones and assessed development impacts in accordance with Australian Standard AS 4970 Protection of Trees on Development Sites.

It is acknowledged that the two reports reached different conclusions regarding the number and classification of affected trees. This is not uncommon and reflects a difference in professional opinion and methodology. The key differences are summarised below.

Succession Ecology Report	URPS Report
• 39 significant or regulated trees were identified as potentially impacted • 1 tree was classed as Significant Trees • 34 trees were classed as Regulated Trees • Four trees were assessed as exempt from the regulated and significant tree definition due to their status as declared plants under the <i>Landscape South Australia Act 2019</i> (<i>Casuarina glauca</i>, Grey Buloke)	• 40 trees were assessed as potentially impacted • 6 trees were classed as Significant Trees • 33 trees were classed as Regulated Trees • 1 tree (Tree 42) was classed as exempt due to its a trunk circumference <1m is not controlled under the <i>Planning Development and Infrastructure Act 2016</i>.

Notably, the URPS assessment identified a greater number of Regulated and Significant Trees than the Succession Ecology report. The URPS assessment also provides a detailed Arboricultural Impact Assessment. This level of assessment is necessary to understand development impacts and determine whether proposed tree removal or encroachment is reasonable.

The Arboricultural Impact Assessment concludes Trees 26-41 (16 trees) and 47-64 (18 trees) are recommended for removal.

These trees do not satisfy the tests in PO 1.1 and PO 1.2 of the Regulated and Significant Tree Overlay in the Planning & Design Code. This means that they are not Regulated or Significant Trees worthy of retention and are therefore suitable for removal. Approval is required to remove these trees.

The trees recommended for removal will be replaced in accordance with the *Planning Development and Infrastructure Act 2016*. Replacement species will be indigenous to the local area.

Laydown Area

Representors raised concerns that the notified laydown area was not included in this application.

These laydown activities do not require development approval.

ElectraNet intends to use areas within its easement and the substation area for material storage and laydown during construction only.

Additional ANI land east of the new substation will also be available for temporary car parking, laydown and storage associated with construction.

This will operate in a similar way to a builder's site office during construction of an approved development. This is excluded from requiring an approval by Schedule 4 (h)

Once construction is complete, these areas will be removed.

Conclusion

Thank you for the opportunity to address the representors' concerns. These primary relate to coastal hazards, flooding, environmental impacts, referrals, decommissioning, vegetation removal and construction laydown arrangements.

These matters are addressed in this response. Development Approval should be granted.

URPS and ANI will attend the State Commission Assessment Panel meeting. We will be available to respond to these concerns verbally and answer any questions from SCAP members.

Please contact me on 8333 7999 if you have any questions.

Yours sincerely



Brigitte Williams
Senior Consultant