

12 August 2026

Chairperson
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

Dear Sir/Madam

Development Application No.:	26016431
Applicant:	Australian Naval Infrastructure & ElectraNet
Proposal:	Alterations & extensions to the Pelican Point Substation, construction of a new substation east of Lefevre Substation, relocation and undergrounding of 275kv electricity transmission lines, and tree damaging activity
Subject Land:	762 – 778 Mersey Rd North Osborne and Lots 28 & 29 Pelican Point Rd, Outer Harbor

Thank you for referring the above-mentioned development application to Council.

Please see below the comments of Council Staff in relation to the proposed development:

Stormwater Management

1. It is of concern that stormwater water quality treatment in relation to the proposed southern substation works has been largely overlooked:
 - a. Stormwater quality improvement should be demonstrated and achieved in accordance with the Planning and Design Code and the overarching NPSCY Stormwater Management Plan prepared by ANI for Osborne.
 - b. The stormwater report essentially states that stormwater treatment will be "considered later". However, the current site and stormwater management plans are already well advanced and show no stormwater treatment provisions (refer page 76 of 113 in 260520_r1_v4_servicerelocation275kv-143779585-14683862).
 - c. The stormwater report does not provide any information regarding the stormwater quality targets that are proposed to be met. These targets need to be confirmed to establish a basis for approval. And conceptual modelling should be undertaken to determine the treatment infrastructure that will likely be required to achieve these targets. The outcomes should then be incorporated into the concept siteworks and stormwater management plans.

2. On site detention in relation to the proposed southern substation works is proposed despite being unnecessary given the site's proximity and ability to discharge directly to the Port River.
3. The lack of consideration of tailwater levels will have a major impact on the design as the size of the detention basins, minimum site levels, and overall detention basin footprint would likely need to increase considerably.
4. The concept civil works plan on page 76 does not clearly demonstrate that the minimum site and floor levels (3.10 m AHD and 3.35 m AHD respectively) will be met to protect the development from coastal flooding in accordance with the Planning & Design Code and Coast Protection Board requirements.

In relation to the southern substation works, the need for stormwater detention should be reviewed, stormwater treatment targets confirmed, and conceptual stormwater quality modelling undertaken to confirm the expected treatment measures required to achieve the adopted stormwater management objectives. Any necessary stormwater treatment infrastructure should be shown on the conceptual siteworks plans along with demonstration that the minimum site levels required to protect against coastal flooding have been achieved.

Environmental Management

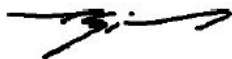
5. There are discrepancies between the Arborist Report and the Ecology Report, with respect to the regulated and significant trees, that are confusing and should be clarified. For example, the tree numbering differs between the reports and there appear to be trees listed in each report that are not accounted for in the other. For example, the sheoak trees numbered 56 – 62 in the Arborist Report do not appear to be incorporated into the Ecology Report. There are also some trees identified in the Ecology Report (e.g. 29 – 31 & 34 – 39) that are rated as having a high ecological value that do not appear to be incorporated into the Arborist Report. And in relation to the Arborist Report there are trees specified (e.g. trees numbers 42 to 44, to be retained and protected) that do not appear identifiable in the accompanying aerial plans or tree protection plans. Where trees are identified as having a high ecological value and are proposed for removal the applicant should provide specific justification demonstrating why retention is not reasonably practicable including having regard to their ecological value.
6. Clarity should be provided, in relation to the regulated trees proposed for removal, in relation to whether replacement planting is proposed, whether financial offsets are intended, and how revegetation will occur locally. Replacement planting should be undertaken wherever practicable within the development site, with species selected to provide appropriate habitat, canopy and biodiversity benefits. A revegetation plan should be developed that includes:
 - a. A 3–5-year maintenance and watering plan for newly planted trees to support establishment.
 - b. Whether replacement trees will be replaced if they fail to establish in the first five years.

Where replacement planting cannot be accommodated, and a financial offset is required, Council's preference is for the offset funds to be paid to Council's Urban Tree Fund.

7. In relation to the native revegetation of Mutton Cove, it is important that the rehabilitation aim be ecological restoration rather than simply replacing disturbed/removed vegetation with general landscaping. In some cases this may mean leaving the site undisturbed and allowing natural revegetation to occur (while monitoring for weeds). The application should develop a site-specific native revegetation and rehabilitation plan. The plan should include locally appropriate native species for the sensitive tidally connected environment; establishment and maintenance requirements; replacement of failed plants; weed management; and a 3-5 year minimum monitoring period.
8. Mutton Cove is an important conservation area supporting coastal habitats, biodiversity and blue carbon values. It is also directly adjacent and interconnected with the Adelaide Dolphin Sanctuary (ADS). In relation to the potential impacts of trenching, cable installation and tower removal within the sensitive estuarine environment and the ADS the following should be given further consideration:
 - a. The potential effects of leaving the deep concrete footings in place, following demolition of the transmission towers, should be further considered including whether this could contribute to future erosion or exposure. The long term stability of the embankment (erosion protection) and rehabilitation outcomes for the tidally influenced habitat should be further considered.
 - b. The disturbance of acid sulfate soils could have significant environmental consequences if not appropriately managed. The applicant should review the adequacy of their investigations, management plans and contingency measures identified for unexpected site conditions.
 - c. In relation to the construction methodology, extra planning and caution is recommended as standard construction controls may not be sufficient during tidal inundation or high rainfall events. Erosion and sediment controls must be appropriate for an intertidal environment and be included in the Construction Environment Management Plan and "Soil management plans". Long-term stability following construction must also be considered further than what has been documented. Council would also like to see a plan for ongoing monitoring after construction.

Please do not hesitate to contact me on 8405 6717 if you have any queries in relation to this matter.

Yours sincerely



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