



25 August 2026

Fiona Selleck
State Commission Assessment Panel (SCAP)

By Planning Portal

Dear Fiona

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COAST PROTECTION BOARD Development Applications
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Development Application No	26016431
Applicant	Australian Naval Infrastructure & ElectraNet
Description	Alterations and extension to Pelican Point Substation & new substation east of Lefevre Substation including undergrounding of 275kV electricity transmission lines
Zones / Overlay	Strategic Employment, Coastal Waters and Offshore Islands, Conservation, Open Space & Ports Sub-Zone / Coastal Areas Overlay
Location	Osbourne & Outer Harbour: - CT 6231/3, D121984 AL506 - CT 6011/467, D76309 AL22 - CT 6316/815, D136949 AL 3003 - CT 6322/501, D52266 AL28 - CT 6322/502, D52266 AL29
Council	City of Port Adelaide Enfield

I refer to the above development application forwarded to the Coast Protection Board (the Board) pursuant to Section 131(10) of the *Planning, Development and Infrastructure Act* (PDI Act) 2016.

The following response is provided by the Board in compliance with its policies. Those policies are contained in the Board's Policy Document which is located on the following website:
<https://cdn.environment.sa.gov.au/environment/docs/CPB-Policy-October-2022.pdf>

Proposal

The proposed development is for alterations and 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 activities.

The proposal is to provide essential electrical infrastructure associated with the Osborne Naval Shipyard and is located within the Strategic Employment Zone, Coastal Waters and Offshore Islands Zone, Conservation Zone, Open Space Zone, Ports Sub-Zone and the Coastal Areas Overlay.

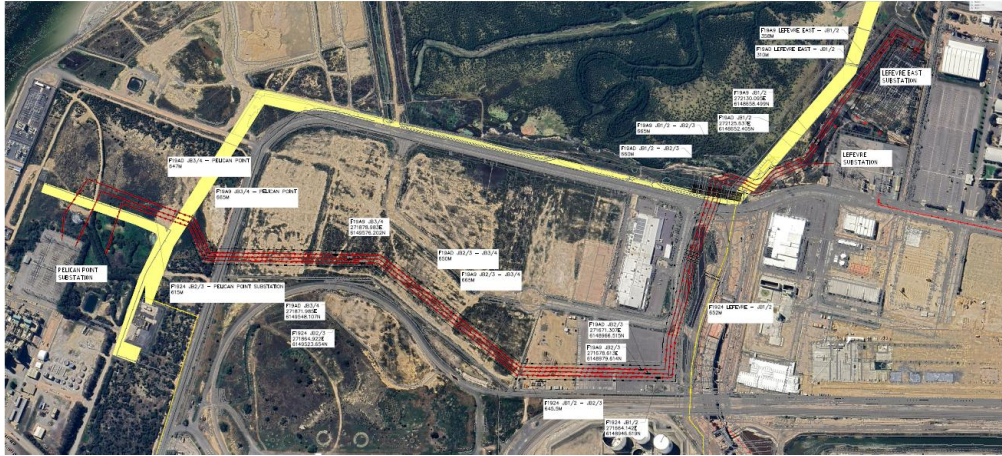


Figure 4 – Underground 275kV electricity transmission lines (Planning Report - Annexures)

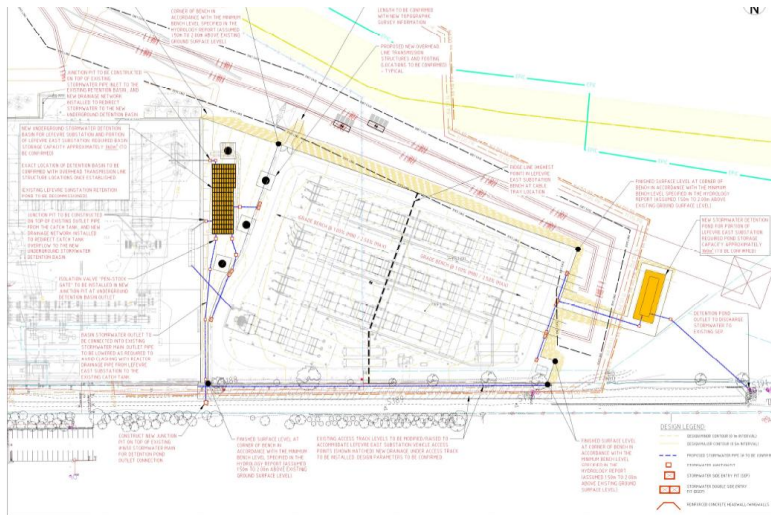


Figure 5 – Lefevre East Substation (Stormwater Management Plan)

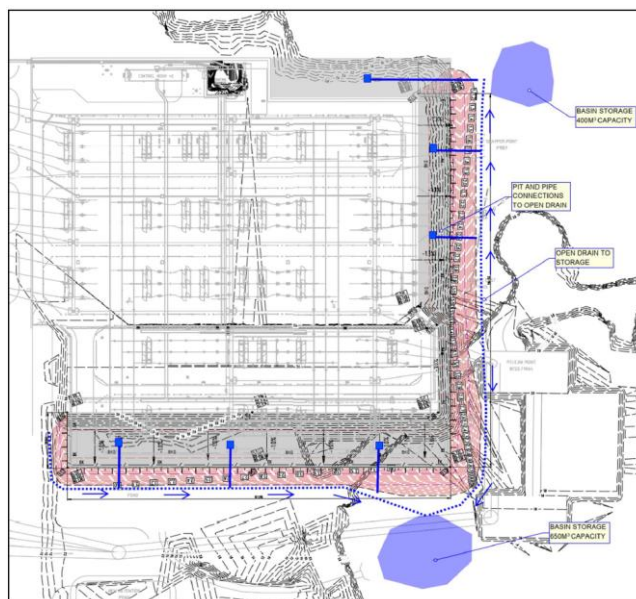


Figure 6 – Pelican Point Substation (Stormwater Management Plan)

Discussion

Coast Protection Board Policy

As per the Coast Protection Board's Policy Document 2022, the Board seeks to:

- Retain coastal open space;
- Minimise impacts of development on the coast;
- Maintain compact coastal settlements and restraining 'sprawl' along the coastline;
- Protect scenic amenity;
- Protect coastal biodiversity;
- Enable planning and delivery of adaptation measures to the foreseeable impacts of climate change on coastal development, environments and uses;
- Minimise or stop development in areas subject to coastal hazards (including coastal flooding, erosion, dune drift and acid sulphate soils);
- Minimise future protection costs by ensuring new development satisfies the Board's flooding and erosion policies; and
- Conserve developed coastal areas

Stormwater Management

Coast Protection Board Policy 1.4 (d) states:

"Minimise the impact of stormwater discharge to the coast and nearshore waters. [Stormwater should preferably be directed to wetlands or when appropriate to natural drainage channels]"

The Board seeks to minimise the impact of stormwater discharge to the coast. Impacts from stormwater should be appropriately managed at this site given the environmental values of the location, which includes the adjacent Mutton Cove Conservation Park and Port River.

To facilitate an increase in runoff at the Lefevre site the existing retention pond (between the existing and proposed substation) would be transformed into a new underground On-Site Detention basin (OSD), including a new detention pond east of the new substation. The site would then be connected via an array of underground pipe networks, that divert stormwater runoff to the detention ponds/basins, before being directed to the stormwater mains south of the site where it is then discharged into the Port River.

The pollutants and contaminants associated with the site are deemed to pose minimal risk to the sensitive receiving environment and consist of mainly dust, with the oily water reactor at the new substation to be bunded and directed to the existing oil/water separator tank at the existing substation. The controlled runoff via an underground pipe network minimises surface related erosion and sediment mobilisation, with the detention ponds/basins facilitating water quality treatment before being discharged.

In the event the downstream stormwater mains become blocked, the new OSD will safeguard the site by allowing overflow north through Grated Inlet Pits into the adjacent Mutton Cove vicinity. Applicant information indicates the overflow path associated with the existing retention basin *"could not be identified"*, and as such is assumed that uncontrolled overflow and runoff occurs during intense rainfall events, which can cause erosion and mobilisation of sediments. The proposed stormwater management plan minimises the occurrence and utilisation of this overflow pathway, provided the downstream stormwater main is maintained before the wet seasons of winter/spring (June to August).

The basin also incorporates an extra protection layer in the form of a shut off valve at the outlet for emergency scenarios (e.g. reactor fire), which will be lined to prevent contamination of the below soil profile/groundwater. In the event of a reactor fire requiring the isolation valve to be shut, the site and OSD shall be cleaned/flushed prior to reopening the valve to prevent any contaminants entering the Port River. The Board notes the implementation of a sediment, erosion and drainage management plan (SEDMP) at the Pelican Point site and advises that due to the sensitive nature associated with the surrounding environment at the Lefevre site, a SEDMP needs to be implemented during the construction phase to alleviate the potential for erosion and sediment mobilisation into the Port River and adjacent Mutton Cove.

Applicant information also indicates that the Pelican Point site currently has minimal stormwater management infrastructure with runoff flowing overland to trapped low points located north east and south east of the site, where it is retained and dispersed via infiltration and evaporation. The proposed stormwater management plan will direct stormwater via pits, pipes and open drains to existing low lying areas that act as a storage basin. The applicant has indicated that sufficient space exists in the low lying area for a formalised basin if required. The Board considers the surrounding environment at Pelican Point to be industrialised, and poses minimal risk, as no formal stormwater mains are present that could potentially introduce runoff into the Port River. Council should determine whether formalised basins are required to safeguard the surrounding site.

Coastal Flooding

Coast Protection Board Policy 1.4 (b) states:

“The Board will seek to minimise the exposure of new and existing development to risk of damage from coastal hazards and risks to development on the coast.”

For compliance with the Board’s coastal flooding risk standard, minimum building site and floor levels of 3.3 and 3.55 metres AHD respectively, are generally required for development in this location. These levels allow for a 1% Annual Exceedance Probability (AEP) sea flood level (tide, stormwater and associated wave effects combined) and 0.30m of sea level rise to year 2050.

Board policy also requires that the development is capable, by reasonably practical means, of being protected, adapted or raised to withstand a further 0.7 metres of sea level rise to the year 2100.

Application information indicates that the Pelican Point substation extensions will have a finished floor level comprised of a 1% paving gradient from 3.3m to 3.76m AHD. A portion of the site is deemed to be compliant with the minimum finished floor levels for this location.

Upon the request of the applicant the City of Port Adelaide Enfield Council suggested finished bench levels between 3.1m and 3.35m AHD for the Lefevre East Substation, with finished bench levels to be approximately 1.5m to 2.0m above current existing ground surface levels for the site. The applicant has indicated that bench levels will be dictated by sea level rise and climate change factors and are to be confirmed by Hydrology Reporting.

The development should ideally comply with the Boards 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.

Coastal Acid Sulfate Soils

Coast Protection Board Policy 1.3 states:

“The Board will identify specific areas of the coast that require particular management actions. [In doing so, it shall have regard to coastal flooding and erosion, dune drift, acid sulfate soils, areas of conservation significance and landscape amenity values].”

Coastal Acid Sulfate Soils (CASS) have the potential to cause major habitat loss and degradation due to the release of acid and heavy metal ions into the environment. There is also a threat to development after construction due to deterioration and corrosion by the disturbance of CASS. Land and water in the vicinity of the development area may have the potential to develop acid sulfate conditions if exposed to oxygen. Any spoil material should be closely monitored and tested for potential CASS and a contingency plan to remediate this should be put in place, via an appropriate soil expert. The Coast Protection Board has released a set of guidelines which should be followed in areas where acid sulfate soils are likely to occur. These can be found at:

[january_2003_strategy_for_implementing_cpb_policies_on_acid_sulphate_soils.pdf](#)

Coastal Environment

Coast Protection Board Policy 1.4 (e) states:

“The Board will seek to ensure that the siting and design of development on the coast minimises its impact on the environment, heritage and visual amenity of the coast.”

Any imported substrate material or engineered fill shall be free of weeds and pathogens to ensure that noxious weed or contamination sources are not introduced into the coastal environment.

Any landscaping associated with this development should use local native coastal species, avoiding the spread of exotic plants in the coastal environment. Green Adelaide should be contacted should the applicant require expert advice and specific species lists.

The Board's notes the removal of regulated and significant trees and advises that development should avoid or minimise any unnecessary clearance or removal of established trees or vegetation.

Adelaide Dolphin Sanctuary

The waters within the Port River fall within the area covered by the Adelaide Dolphin Sanctuary Act 2005. The purpose of this Act is to protect the dolphin population and their natural habitat, including the protection of the dolphin population from direct physical harm including changes in water quality. Contractors should be made aware of the Adelaide Dolphin Sanctuary Act and that there is a general duty of care to protect the dolphin population from physical harm.

The applicant should also be reminded of their general environmental duty, as required by Section 25 of the Environment Protection Act, to take all reasonable and practical measures to ensure that the activities on the whole site, including during construction, do not cause environmental harm.

Coast Protection Board Response

The Coast Protection Board advises it has no objections to the proposed development and directs that the following conditions are applied to any approval:

Condition

- In the event of a reactor fire requiring the isolation valve to be shut, the site and OSD shall be cleaned/flushed prior to reopening the valve to prevent any contaminants from entering the Port River.
- A sediment, erosion and drainage management plan (SEDMP) shall be implemented at the Lefevre site during the construction phase, to alleviate the potential for erosion and sediment mobilisation into the Port River and adjacent Mutton Cove.
- Where minimum finished floor levels are not achieved, the Board requires that all mechanical, chemical and electrical equipment vulnerable to water ingress shall be raised to a minimum level of 3.55 metres AHD.
- Any imported substrate material or engineered fill shall be free of weeds and pathogens.

Recommended Advisory Notes

- The downstream stormwater main should be maintained/inspected before the wet seasons of winter/spring (June to August), to prevent overflow north into the adjacent Mutton Cove vicinity.
- Coastal Acid Sulfate Soils (CASS) have the potential to cause major habitat loss and degradation due to the release of acid and heavy metal ions into the environment. There is also a threat to development after construction due to deterioration and corrosion due to the disturbance of CASS. The land over which the development is situated may have the potential to develop acid sulfate conditions if exposed to oxygen. Spoil material should be closely monitored and tested for potential CASS and a contingency plan to remediate this action should be put in place, via an appropriate soil expert. The Coast Protection Board has released a set of guidelines which should be followed in areas where acid sulfate soils are likely to occur. These can be found at:

http://www.environment.sa.gov.au/about-us/boards-and-committees/Coast_Protection_Board/Coastal_acid_sulfate_soils

- Any landscaping associated with this development should use local native coastal species, avoiding the spread of exotic plants in the coastal environment. Green Adelaide should be contacted should the applicant require expert advice and specific species lists.
- Development should avoid or minimise any unnecessary clearance or removal of established trees or vegetation, in particular regulated or significant trees.
- The waters within the Port River fall within the area covered by the Adelaide Dolphin Sanctuary Act 2005. The purpose of this Act is to protect the dolphin population and their natural habitat, including the protection of the dolphin population from direct physical harm including changes in water quality.. Contractors should be made aware of the Adelaide Dolphin Sanctuary Act and that there is a general duty of care to protect the dolphin population from physical harm.
- The applicant should also be reminded of their general environmental duty, as required by Section 25 of the Environment Protection Act, to take all reasonable and practical measures to ensure that the activities on the whole site, including during construction, do not cause environmental harm.

Disclaimer

The Board attaches the following disclaimer to the above advice;

Based upon current knowledge and information the development and development site is at some risk of coastal erosion and inundation due to extreme tides notwithstanding any recommendations or advice herein, or may be at future risk. Neither erosion nor the effect of sea level change on this can be predicted with certainty. Also, mean sea level may rise by more than the 0.3 metres assumed in assessing this application.

Accordingly neither the South Australian Coast Protection Board nor any of its servants, agents or officers accept any responsibility for any loss of life and property that may occur as a result of such circumstances.

If this application is approved, the Council should consider including a similar disclaimer in its Decision Notification to the applicant. However, no reference must be made to the Coast Protection Board in the Council's disclaimer.

Yours sincerely



Kym Gerner
Coast and River Planner-Coast Unit
Department for Environment and Water
Delegate for the Coast Protection Board