

Australian Naval Infrastructure and ElectraNet

Alterations and extension 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

Mersey Rd N, Osborne / Pelican Point Rd, Outer Harbor

Development Application 26016431 (s130 Essential Infrastructure)



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OVERVIEW

DEVELOPMENT NO.	26016431
APPLICANT	Australian Naval Infrastructure and ElectraNet
CONSENT SOUGHT	Development Approval
ADDRESS	756 Mersey Rd N Osborne (CT 6231/637 D12984 AL503) 762-776 Mersey Rd N Osborne (CT 6231/3 D121984 AL506) 778 Mersey Rd N Osborne (CR 6011/467 D76309 AL22) Lot 3003 Mersey Rd N Osborne (CT 6316/815 D136949 AL3003) Lot 28 Pelican Point Rd Outer Harbor (CT 6322/501 D52266 AL28) Lot 28 Pelican Point Rd Outer Harbor (CT 6322/502 D52266 AL29)
NATURE OF DEVELOPMENT	Alterations and extension 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
ZONING INFORMATION	Zones • Conservation, Open Space, Strategic Employment Sub Zones • Ports Overlays • Adelaide Dolphin Sanctuary • Defence Aviation Area (All structures over 90 metres) • Gas and Liquid Petroleum Pipelines • Gas and Liquid Petroleum Pipelines (Facilities) • Prescribed Wells Area • Regulated and Significant Tree • Water Resources • Coastal Areas • Hazards (Flooding) and Hazards (Flooding – General) • Historic Shipwrecks (State) • Native Vegetation
LODGEMENT DATE	15 July 2026
RELEVANT AUTHORITY	Minister for Planning
PLANNING AND DESIGN CODE	P&D Code (in effect) - Version 2026.12 2/7/2026
CATEGORY OF DEVELOPMENT	Essential Infrastructure (s130)
APPEAL RIGHTS	Nil
NOTIFICATION	Public notification required – Two (2) representatives, wish to be heard.
REFERRALS STATUTORY	City of Port Adelaide Enfield Department for Energy and Mines (development near pipelines) Coast Protection Board
DELEGATION	SCAP (as the delegate of the SPC) to provide advice to the Minister for Planning pursuant to Section 130 (13) of the <i>Planning, Development and Infrastructure Act 2016</i> .
REPORT AUTHOR	Fiona Selleck, Senior Planner

EXECUTIVE SUMMARY

The proposed development involves relocation and undergrounding of electricity transmission lines, the construction of one new substation (Lefevre East), expansion of an existing substation (Pelican Point), and associated infrastructure.

The works are required to provide sufficient electricity capacity to support the expansion of naval ship building activities at the existing Osborne Naval Shipyard and proposed Submarine Construction Yard, while maintaining electricity supplies to existing users.

The subject land comprises several allotments owned by Australian Naval Infrastructure (ANI) and authorised electricity providers, as well as a portion of Crown Land under the management of the Department for Environment and Water (DEW). The applicant and DEW are finalising arrangements for acquisition of the latter.

The proposal does not require a referral under the *Environment Protection and Biodiversity Conservation Act (Cwth) 1999* (EPBC Act).

The development cost of the project exceeds \$10 million and was therefore publicly notified for 15 business days between 22 July 2026 and 11 August 2026. Two (2) submissions were received – in opposition of the proposal with the respondents electing to be heard. The primary concerns relate to the potential flooding, impacts on coastal processes and the conservation value of Mutton Cove and the removal of regulated trees. The applicant has prepared a response to the respondents' concerns.

Council does not object to the proposed development, however requests conditions of approval be attached to any decision granted, relating to stormwater quality management and offsetting of tree removals. The applicant has prepared a response to Council concerns.

The Department for Energy and Mines (DEM) and Coast Protection Board (CPB) also had no objections to the proposal subject to conditions of approval in relation to technical requirements related to building near gas pipelines and sensitive coastal environments. The applicant supports the proposed conditions.

The potential for environmental impacts during construction can be appropriately managed through the implementation of a Construction Environmental Management Plan (CEMP).

The Strategic Employment Zone and Port Subzone of the Planning and Design Code (the Code) support a range of industrial related uses and compatible activities that generate wealth and employment for the state. The construction of electricity infrastructure to support the proposed expansion of existing Australian defence shipbuilding activities at Osborne is consistent with the intent of the zone.

While electricity infrastructure is not explicitly envisaged in the Open Space or Conservation Zones of the Code, the proposed works are duplication of the existing Lefevre Substation. Siting of the new substation adjacent the existing substation and on land that has been substantially disturbed is orderly and prevents encroachment and fragmentation of the primary conservation areas of Mutton Cove and the coastal interface. The proposed removal of the existing 275kV overhead transmission lines running along the western edge of Mutton Cove will positively contribute to visual and environmental amenity.

The proposed development is considered to be generally in accordance with key policies of the Strategic Employment, Conservation and Open Space zones, the Gas and Liquid Petroleum Pipelines, Regulated and Significant Tree and Adelaide Dolphin Sanctuary overlays, and General Development policies relating to energy infrastructure, interface matters, and water sensitive design.

It has been assessed that the proposal is generally consistent with the relevant provisions of the Planning and Design Code and warrants the granting of Development Approval, subject to the assignment of relevant conditions to manage external impacts during construction and operation.

ASSESSMENT REPORT

1. BACKGROUND

1.1 Project Drivers

The proposed relocation and undergrounding of electricity transmission lines and the construction of two new substations is required to provide sufficient electricity capacity to support the expansion of naval ship building activities at the existing Osborne Naval Shipyard (ONS) and forthcoming Submarine Construction Yard (SCY), while maintaining electricity supplies to existing users.

The existing ONS occupies a 175-ha site bounded by the Outer Harbor freight rail corridor to the west and the Port River to the east. The facility supports the construction and maintenance of naval surface vessels and submarines for the Australian Defence Force. The Australian Government has committed long-term funding to sustain and expand shipbuilding capability at Osborne in support of future defence requirements, including commitments under the AUKUS security partnership between Australia, the United Kingdom and the United States. These long-term commitments include the establishment of the new SCY, which was the subject of a separate development application approved by the Minister for Planning on 4 December 2025 following an impact assessment.

In the declaration notice for the SCY, the Minister specified that the relocation of existing electricity transmission lines, substations and gas pipelines was excluded from that assessment process. The relocation of electricity transmission lines and expansion of substations is the subject of this application.

ANI has overseen collaborative planning by utilities, including ElectraNet, SA Water, SEAGas and Epic Energy, to ensure a coordinated approach to the relocation and upgrading of assets to enable timely development of the ONS and SYC.

1.2 Environment Protection & Biodiversity Conservation Act (Cwth) 1999 (EPBC Act)

A referral under the EPBC Act was not required.

1.3 Process

An application was lodged with the State Planning Commission (SPC) on 15 July 2026. The application has been assessed in accordance with the provisions of Section 130 (Essential Infrastructure – Alternative Process) of the *Planning, Development and Infrastructure Act 2016* as the proposal is for electricity infrastructure being undertaken by a *prescribed person* (ElectaNet) as defined under the Act and regulations. The assessment included mandatory and informal referrals, and public notification.

2. DETAILED DESCRIPTION OF PROPOSAL

2.1 Proposal

The proposal involves augmentation of electrical infrastructure comprising:

- Construction of a new Lefevre East Substation adjacent the existing Lefevre Substation
- Alterations and expansion of the existing Pelican Point Substation
- Light poles, lightning masts, weather station and communication / radio towers up to 30 metres
- Removal of 31 regulated and 3 significant trees
- Partial demolition of redundant overhead infrastructure, with buried footings to remain
- Construction of 275kV overhead transmission lines connecting the substations to underground lines
- Installation of 275kV electricity cable under land subject to coastal processes (east of Mersey Road N adjacent the proposed Lefevre East Substation).

2.2 Out of scope (excluded from the definition of development):

- Installation of underground 275kV electricity transmission lines on land not subject to coastal processes – Reg Sch 4A(1)(1)(b)
- Substation fencing less than 3.2m in height - Reg Sch 4A(1)(1)(g)
- Buildings within the existing security-fenced area of an existing substation - Reg Sch 4A(1)(1)(a)(iv)



Figure 1: Site Plan (NB only the underground 275kV line adjacent Lefevre Substation are in scope of this DA)



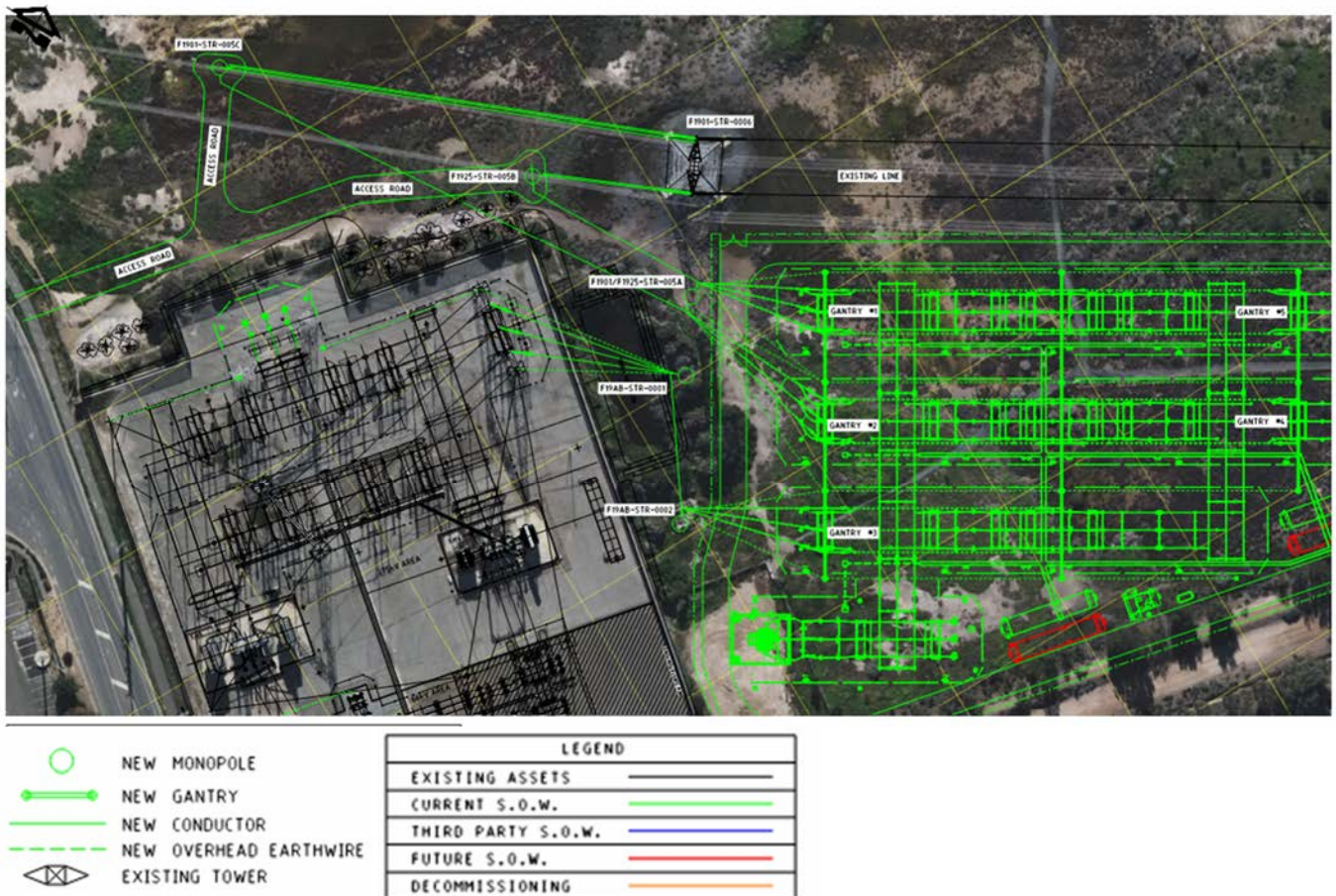


Figure 4: Site Plan – Lefevre East Substation and associated structures and overhead 275kV connections

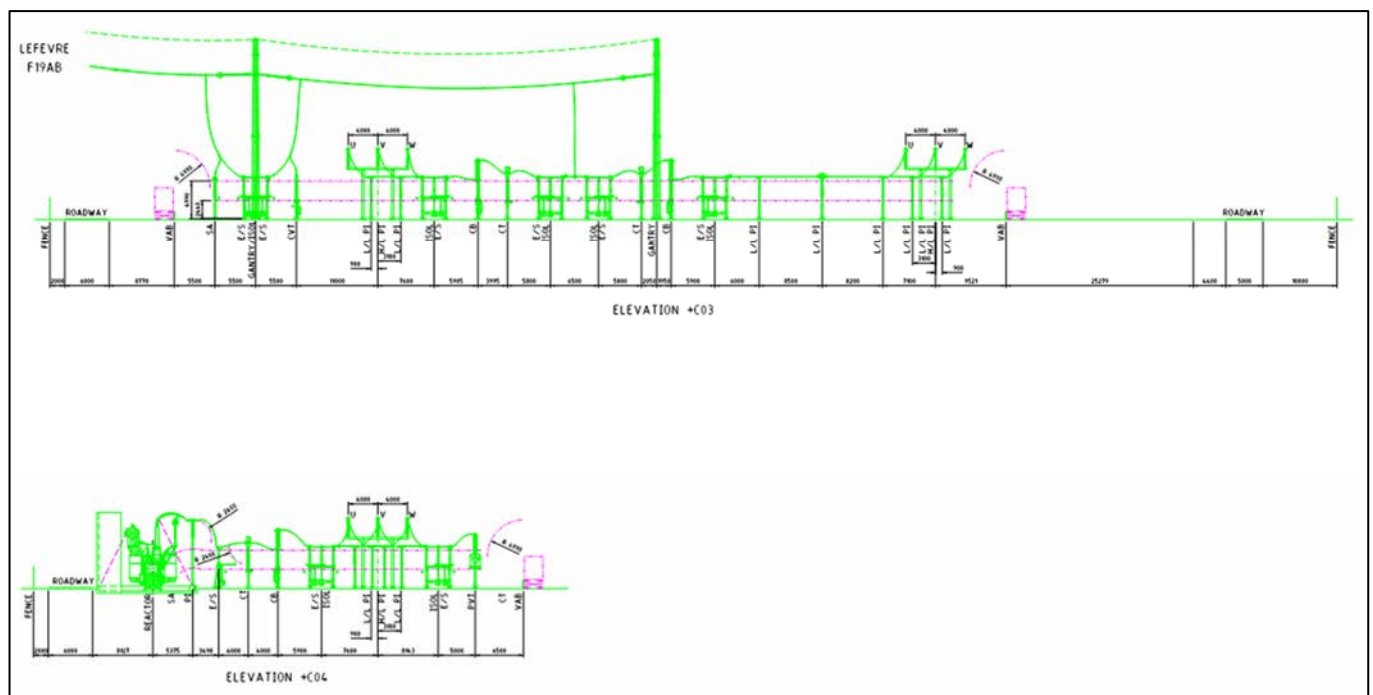


Figure 5: Elevation Sections – Lefevre East Substation



3. SITE AND LOCALITY

Location Reference	Plan Parcel	Title Reference	Council
756 Mersey Rd N, Osborne	D121984 AL503	CT 6231/637	Port Adelaide Enfield
762 – 776 Mersey Rd N, Osborne	D121984 AL506	CT 6231/3	Port Adelaide Enfield
778 Mersey Rd N, Osborne	D76309 AL22	CR 6011/467	Port Adelaide Enfield
Lot 3003 Mersey Rd N, Osborne	D136949 AL3003	CT 6316/815	Port Adelaide Enfield
Lot 28 Pelican Point Rd, Outer Harbor	D52266 AL28	CT 6322/501	Port Adelaide Enfield
Lot 28 Pelican Point Rd, Outer Harbor	D52266 AL29	CT 6322/502	Port Adelaide Enfield

3.1 Locality

Northern Lefevre Peninsula, north of Victoria Road, is a long-established hub for defence, energy and export related activities requiring 24/7 operations. Key facilities are the Flinders Ports Container Terminal, ARTC rail corridor, bulk fuel and grain terminals, and the Lefevre, Pelican Point and Snapper Point power stations. The east of the peninsula is occupied by the ONS and forthcoming SCY, as well as the Mutton Cove conservation reserve.



Figure 8: Locality Plan

3.2 Site Description

The development site comprises four distinct precincts:

- **Precinct 1** - Lots 28 & 29 Pelican Point Rd – two parcels of land north of Mersey Road N occupied by the Pelican Point Power Plant and Substation, access roads, a stormwater retention basin, and planted vegetation including regulated trees. The Moomba-Adelaide and Port Campbell Adelaide gas pipelines traverse the site, servicing the Pelican Point power station, and will continue to do so post-relocations as shown in **Figure 10**.
- **Precinct 2** – Lot 3003 Mersey Road N – known as Area 3 of the forthcoming Submarine Construction Yard, this vacant allotment is largely cleared of vegetation. Epic Energy intends to remove the existing Moomba-Adelaide gas pipeline traversing the site as part of planned relocations. This application proposes partial removal of a single 275kV transmission pole located on the site, with the cement footings below ground to remain in situ.
- **Precinct 3** – Mutton Cove (part 778 Mersey Road N) – a 48-ha conservation reserve on Crown Land and under the management of the Department for Environment and Water (DEW). The reserve hosts salt marsh and Grey Mangrove woodland and features two heritage listed shipwrecks. ElectraNet is removing the overhead 275kV electricity transmission lines that run along the western boundary of the site, with this application seeking approval for the partial removal of two 275kV transmission poles, with the cement footings below ground to remain in situ.
- **Precinct 4** – 756, 762-776 and part 778 Mersey Road N – occupied by the existing Lefevre Substation, the Port Campbell-Adelaide gas pipeline and undeveloped land to the east abutting the Port River. As shown in **Figure 10** and detailed in **Attachment 3C**, SEAGas and Epic Energy intend to relocate their gas pipelines along an alignment similar to the existing easement north of the Lefevre Substation. Regulated trees line the southern and western boundaries, with further stands to the east of the site. ElectraNet is finalising negotiations with DEW regarding acquisition of the portion of 778 Mersey Road N proposed to locate the Lefevre East Substation and ancillary infrastructure.



Figure 8: Development Site Precincts

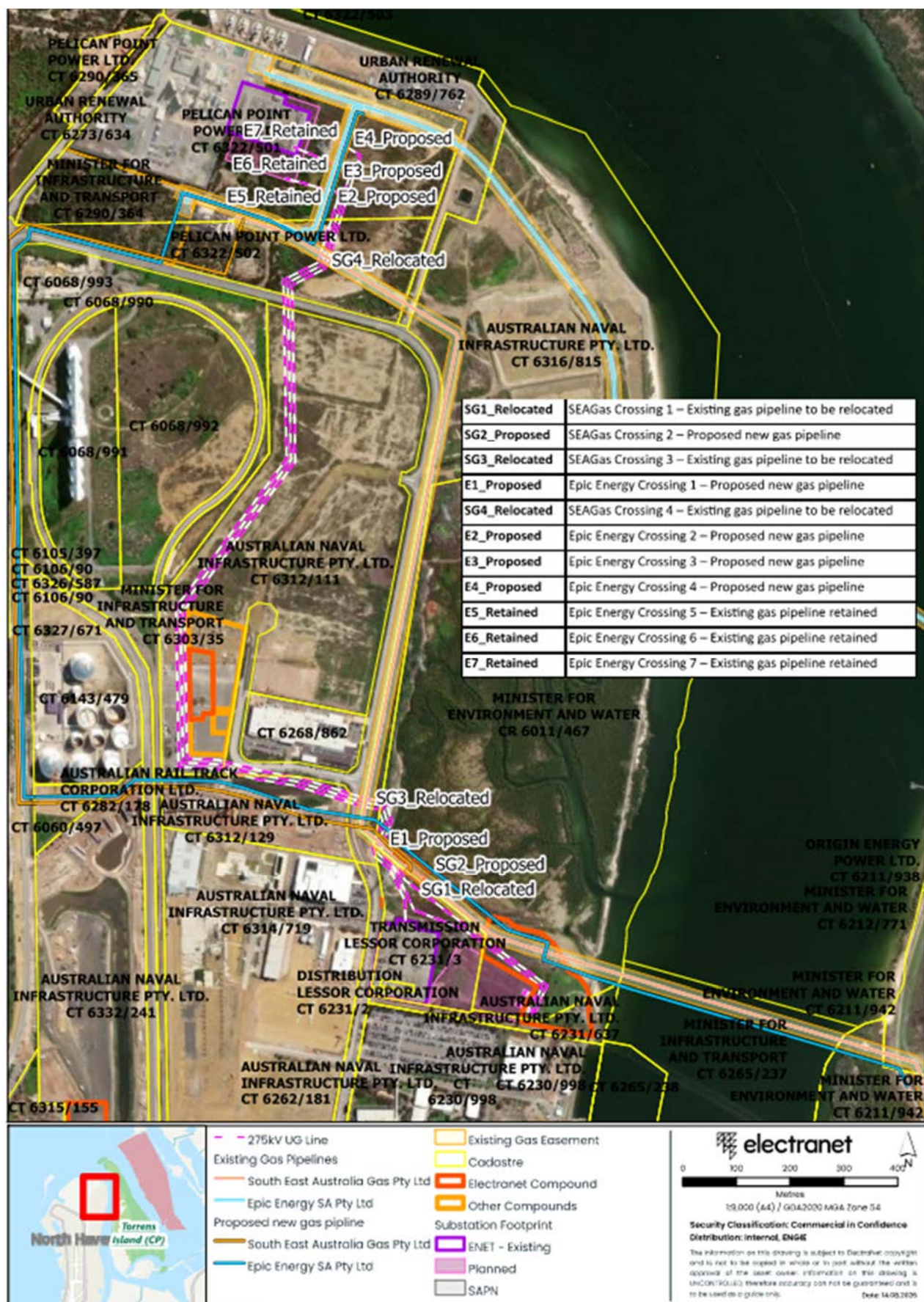


Figure 10: Precinct-wide Proposed Gas and Electrical Infrastructure Relocations

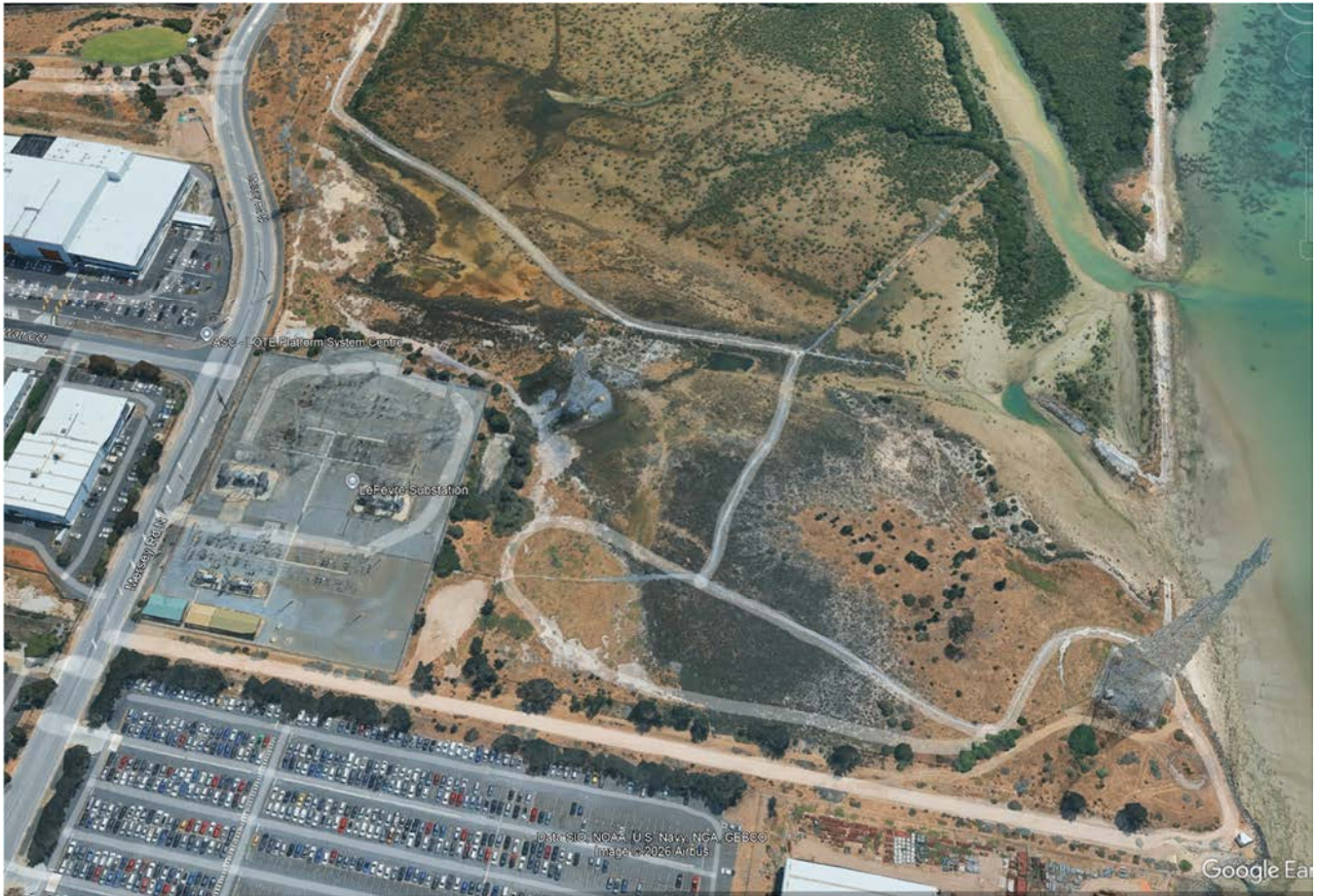


Figure 11: Aerial Photo Lefevre East Substation Site looking north toward Mutton Cove (Source: Google Earth)



Figure 12: Aerial Photo Pelican Point Substation Site looking north toward Port River (Source: Google Earth)

4. CATEGORY OF DEVELOPMENT

- **PER ELEMENT:**
 - Essential Infrastructure - Essential Infrastructure
 - Tree-Damaging Activity – Essential Infrastructure
- **OVERALL APPLICATION CATEGORY:** Essential Infrastructure
- **REASON:** Pursuant to section 130 of the Act

5. DECLARATIONS

Regulated / significant tree impacts:	YES	Removal of 31 regulated trees and 3 significant trees to accommodate the development
State or local heritage:	N/A	None impacted
Certificate of Title:	YES	Declaration submitted
Building safely near powerlines:	YES	Declaration submitted
Native vegetation:	N/A	Native Vegetation Act does not apply

6. STATUTORY REFERRAL BODY COMMENTS

6.1 City of Port Adelaide Enfield

The application was referred to the Council for comment in accordance with Section 130(6) of the *Planning, Development and Infrastructure Act 2017* (the Act). A copy of the referral response is contained in **Attachment 3A** and a copy of the applicant's response is contained in **Attachment 3E**. Both are discussed further in the assessment of the application.

The Council does not object to the proposed development and raised the following matters that they consider require further consideration.

6.1.1 Stormwater Management

Council raised concerns that critical stormwater and flood protection requirements of the Code and Coast Protection Board have not been adequately addressed in the concept site works and stormwater management plans for the Lefevre East Substation works.

In particular, the Stormwater Report prepared by Enveren (Attachment 1H):

- does not identify stormwater quality targets or stormwater treatment infrastructure, nor demonstrate that any stormwater quality modelling has been undertaken to determine required treatments, including consideration of tailwater levels.
- Proposes on-site stormwater detention without providing the rationale for its inclusion given the site's proximity to and ability to discharge directly in the Port River.

Further, concept civil works plans (p76) do not demonstrate compliance with minimum site and floor levels specified by the Code and Coast Protection Board to protect development from coastal flooding.

Summary of Applicant Response

ElectraNet has undertaken a preliminary stormwater quality assessment for the existing Lefevre Substation and proposed Lefevre East Substation. The design adopts Planning and Design Code stormwater quality targets, with preliminary MUSIC modelling demonstrating that the proposed treatment

approach can achieve these targets. Stormwater treatment has therefore been considered at the preliminary design stage and will be refined and incorporated into the final civil and drainage design, in coordination with ANI's NPSCY Stormwater Management Plan.

The proposal does not include traditional stormwater detention to limit peak flows because a dedicated stormwater main will discharge directly to the Port River. Instead, a 93 m³ underground storage system is proposed primarily for emergency oil containment, with secondary stormwater storage benefits during high tide conditions.

Tailwater impacts have now been assessed. While the site platform level of approximately 2.9 m AHD remains above the modelled future flood level and provides over 300 mm freeboard, the assessment identified that the future tailwater level could limit the performance of the gravity drainage system. Detailed design will therefore need to address outlet capacity, additional storage requirements and backflow protection measures.

Overall, stormwater quality targets have been modelled and can be achieved, flood protection levels are considered adequate, and the detailed design phase will further refine drainage, treatment and tailwater management measures.

6.1.2 Environmental Management

Council raised concerns regarding inconsistencies between the two arborist assessments of regulated and significant trees (**Attachments 1F and 1G**). Tree numbering differs between reports, some trees appear in one report but not the other, and variations in which trees are rated as having high ecological value.

Council also sought clarification regarding the approach to offsetting tree removals, revegetation of Mutton Cove, and the impacts of works on the Mutton Cove conservation reserve.

Summary of Applicant Response

The applicant acknowledges the differences between the two Arborist Reports, noting they result from different assessment methodologies. The report prepared by Succession Ecology identified trees on the site but did not assess root protection zones or development impacts. Consequently, a more detailed Arboricultural Impact Assessment was undertaken by URPS using the final development design and Australian Standard AS 4970, which identified affected trees, established protection zones and assessed development impacts.

The URPS report identifies additional Regulated and Significant Trees and concludes that 34 trees (Trees 26-41 and 47-64) require removal. These trees will be replaced in accordance with the Planning, Development and Infrastructure Act 2016 using locally indigenous species.

Regarding Mutton Cove, rehabilitation of affected areas is a requirement of the landowner consent issued by DEW and will be undertaken by the proponent. Concerns about the seawall, coastal erosion, sea level rise and reserve management are acknowledged but are considered existing issues unrelated to the proposal.

The proposed Lefevre East Substation is located within an already disturbed interface adjoining existing infrastructure and industrial land, rather than within an intact high-value area of the conservation reserve. Environmental impacts are therefore expected to be limited and managed through the proposed environmental management framework.

Importantly, the project removes existing transmission line infrastructure currently crossing Mutton Cove, reducing the long-term infrastructure footprint and allowing revegetation and rehabilitation of affected areas. Temporary construction impacts will be managed through a Construction Environmental Management Plan, including erosion and sediment controls, soil management and rehabilitation measures.

6.2 Department for Energy and Mines (DEM) – Development Near Pipelines

This application was referred to the DEM as the Department responsible for administration of the Petroleum and Geothermal Energy Act 2000 in accordance with s.130(9) of the Act and Regulation 104A(5) and Schedule 9, Clause 3, Item 9B of the Regulations, as the subject land is within the Gas and Liquid Petroleum Pipelines and Gas and Liquid Petroleum Pipelines (Facilities) Overlays of the Code.

The proposed development is within the vicinity of the Moomba-Adelaide Pipeline (Epic Energy) and the Port Campbell-Adelaide Pipeline (SEAGas) as detailed in the applicant's response to a request for information issued by DEM (**Attachment 3B**). DEM advise that the vicinity of the proposed development gives rise to potential risks to public safety and the pipelines.

No objection was raised. DEM is satisfied that these potential risks can be adequately mitigated and/or managed for the proposed development through recommended conditions relating to detailed engineering design.

A copy of the referral response is contained in **Attachment 3C** and is discussed further in the assessment of the application.

6.3 Coast Protection Board

This application was referred to the CPB in accordance with s130(9) of the Act and Regulation 104A(5) and Schedule 9, Clause 3, Item 3 of the Regulations as the proposed Lefevre East Substation and associated infrastructure (including underground transmission lines) is located within 100 metres of the mean high water mark.

The CPB does not object to the proposal and recommends conditions and advisory notes relating to measures to mitigate risk of adverse impacts on coastal water quality and protect the development from coastal flood risk.

A copy of the referral response is contained at in **Attachment 3D** and a copy of the applicant's response is contained in **Attachment 3E**. Both are discussed further in the assessment of the application.

Applicant Response

The proponent supports the above conditions and advisory notes. The proposal can comply with this requirement. Flood-sensitive mechanical and electrical equipment will be designed and installed to meet the Board's minimum level requirements. This can be secured by condition and confirmed during detailed design.

7. PUBLIC NOTIFICATION

7.1 Reason and Approach

Pursuant to s.130(12) of the Act, a development assessed under the Essential Infrastructure pathway where the total construction cost exceeds \$10 million must undertake public notification for at least 15 business days.

The application was notified for 15 business days between 22 July 2026 and 11 August 2026 with a public advertisement in the Adelaide Advertiser and physical signs erected on the subject land at the Pelican Point Road and Mersey North Road frontages in accordance with Practice Direction 13.

The applicant provided photographic evidence of placement of the signs of the land and verified that the signs remained in place for the duration of the public notification period.

Application details were displayed on PlanSA's online planning portal and at the principal office of Planning and Building Division of the Department for Housing and Urban Development.

7.2 Representations and Applicant Response

Two (2) representations were submitted during the public notification period from the following organisations, both of which elected to be heard by the State Commission Assessment Panel (SCAP):

1. Friends of the Port River (FPR)
2. Port Adelaide Residents Environmental Protection Group (PAREPG)

The representors raised similar issues, which have been adequately addressed by the applicant. A copy of the representations and applicant's response are provided in **Attachment 4A** and **Attachment 4B** and summarised below.

Representation Comment	Applicant's Response
Coastal Hazards and Flooding The finished floor level of development should be consistent with the CPB requirements.	- Site levels are based on detailed, site-specific TUFLOW flood modelling for current and future conditions, rather than a generic coastal flood level. - The preliminary civil design provides site levels of 3.0 m AHD, with the southern access road at approximately 2.85 m AHD, exceeding the recommended minimum site bench level of 2.75 m AHD. - As the proposal does not involve habitable buildings, finished floor levels have not been specified at this stage. - Where recommended levels cannot be achieved, flood-sensitive mechanical, electrical and chemical equipment will be raised to a minimum of 3.55 m AHD. - Detailed design will confirm final levels and demonstrate compliance with Coast Protection Board requirements prior to construction. - Overall, the proposal can comply with the Coast Protection Board's requirements and a condition of approval to this effect is supported.
Impacts on Mutton Cove - Development is inconsistent with the environmentally sensitive nature of Mutton Cove and its Conservation zoning. - Development should consider sea level rise, storm surges and flooding risks and should not further degrade the banks and structure of Mutton Cove. - How can sediment be prevented from flowing into Mutton Cove and the Port River? - Concerned with undergrounding of 275kV electricity transmission lines through Mutton Cove (south of the SEA Gas pipeline).	- The concerns raised regarding Mutton Cove are independent of the proposal, which is not expected to materially increase environmental risks given the nature and location of the works. - The new substation is located within an already disturbed area adjacent to utility infrastructure and industrial development, avoiding intact or high-value areas of the Mutton Cove Conservation Reserve. - No new transmission corridor is proposed through Mutton Cove. Instead, the project facilitates the removal of existing transmission towers and overhead lines that currently traverse the conservation reserve. - The proposal will reduce the long-term infrastructure footprint within the conservation area, with decommissioned infrastructure corridors to be rehabilitated and revegetated. - Construction impacts will be temporary and managed through a Construction Environmental Management Plan, including erosion, sediment and soil controls, and rehabilitation measures.
Decommissioning - How will further deterioration of the western bank be avoided during the removal of the two transmission towers in Mutton Cove. - Concerns during construction and management of acid sulphate soils.	- Decommissioning will remove all above-ground tower and transmission infrastructure, with foundations removed to approximately 1m below ground level. Deeper foundation elements (which typically extend to 10-15m below ground level) will remain in situ to minimize ground disturbance, environmental impacts, and excessive excavation. - Disturbed areas will be remediated and revegetated with suitable native species in consultation with DEW. - Potential acid sulphate soils will be managed through the Construction Environmental Management Plan and Soil Management Plan, with

Representation Comment	Applicant's Response
	appropriate procedures for identification, handling and treatment if encountered. Overall, decommissioning impacts can be appropriately managed, and the applicant supports conditions to ensure compliance with these measures.
Tree removal - Inconsistency between the Succession Ecology report and the URPS arborist report. - Seeking a reduction in tree removal, consistent with Succession Ecology advice. - Offset tree removals through replacement planting with local species or payment into tree fund. .	- We acknowledge that there are inconsistencies between the two reports. The discrepancies reflect different assessment methodologies, with the URPS assessment identifying more Regulated and Significant Trees and providing a detailed Arboricultural Impact Assessment. - The URPS arborist concluded that the Regulated and Significant Trees proposed for removal are not worthy of retention. - All removed trees will be replaced in accordance with the <i>Planning, Development and Infrastructure Act 2016</i>.
Laydown Area A laydown area proposed to the east of the eastern substation, in the Mutton Cove Conservation Reserve, does not form part of the application.	- The laydown activities do not require development approval. ElectraNet intends to use areas within its easement and 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
Consultation Failure to consult relevant government agencies in the assessment process	Referrals were issued to the local Council, the CPB, and DEM. No other referrals are prescribed by legislation.

8. POLICY OVERVIEW

8.1 Greater Adelaide Regional Plan (2025) (the GARP)

The Greater Adelaide Regional Plan identifies the Osborne precinct as a National Employment (Economic) Cluster for naval shipbuilding activities, and the Outer Harbor precinct as a State Significant Industrial Employment Precinct centring on the Port of Adelaide and supporting freight logistics facilities and transport networks.

8.2 State Planning Policies (SPP)

SPP 1 *Integrated Planning* seeks to coordinate strategic use of land with the necessary services and infrastructure to enhance our economic prosperity and sustainable. Policy 1.6 supports planning for strategic infrastructure to support envisaged patterns of development.

SPP 9 *Employment Lands* seeks the provision of a sufficient supply of land for employment uses to support job growth and economic prosperity. Policies 9.1 and 9.6 support the expansion and clustering of key economic growth areas, including defence, located in strategic locations that improve economic productivity.

8.3 Zoning

The subject site (development footprint) is located within the Conservation, Strategic Employment and Open Space Zones and Ports Subzone of the Planning and Design Code (the Code) at the time of start of assessment, being version 2026.12 (2/7/2026), as shown in **Figure 11**.

Relevant Code policies are contained in **Appendix 1B and 1C** and are summarised below.

Strategic Employment Zone (Ports Subzone) – seeks a range of industrial and commercial land uses and compatible business activities that generate wealth and employment for the state and support commercial port activities and industries that benefit direct water access, including ship building.

Open Space Zone - seeks landscaped open space that provides a range of environmental and community benefits, including biodiversity, urban cooling and passive or active recreation.

Conservation Zone – seeks to conserve and enhance the natural environment and natural ecological processes through low-impact recreational and tourism development.

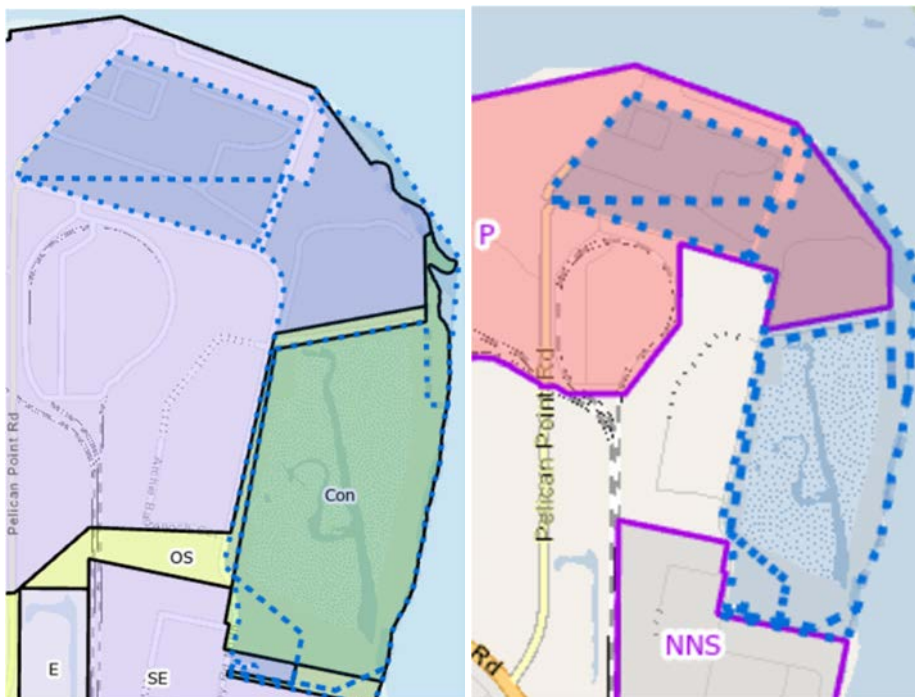


Figure 13: Zones and Subzones

8.4 Overlays

The Code identifies that the following Overlays apply to the identified land parcels, some of which do not apply to the development footprint or the nature of development as denoted below.

Relevant Overlays:

- Adelaide Dolphin Sanctuary
- Coastal Areas
- Gas and Liquid Petroleum Pipelines
- Gas and Liquid Petroleum Pipelines (Facilities)
- Regulated and Significant Tree
- Water Resources

Overlays not relevant to this assessment (footprint of the development or nature of development):

- Defence Aviation Area (All structures over 90 metres) – no structures proposed over 90m
- Hazards (Flooding) – does not apply to footprint of development
- Hazards (Flooding - General) – does not apply to footprint of development
- Native Vegetation – does not apply to footprint of development
- Historic Shipwrecks (State) – does not apply to footprint of development
- Prescribed Wells Area – no taking of water proposed

8.4.1 Adelaide Dolphin Sanctuary



This Overlay applies to Mutton Cove and the proposed location of the Lefevre East Substation and associated connecting transmission lines.

The Overlay seeks to protect the Adelaide Dolphin Sanctuary dolphin population and their habitat (DO1), including by ensuring stormwater runoff is disposed of in a manner that avoids pollution or other detrimental impacts to the sanctuary (PO1.3).

Figure 14: Adelaide Dolphin Sanctuary Overlay

8.4.2 Coastal Areas



This Overlay applies to coastal fringe of the subject land parcels. The development footprint within the Overlay comprises the eastern portion of the proposed Lefevre East Substation, associated underground transmission lines and removal of regulated trees.

The Overlay seeks to conserve and enhance the natural coastal environment (DO1), including by providing for natural coastal processes and recognising current and future coastal hazards, including flooding, erosion and sea level rise (DO2).

Figure 15: Coastal Areas Overlay

8.4.3 Regulated and Significant Tree

This Overlay applies to the whole of the subject site.

The Overlay seeks to conserve regulated and significant tree to provide aesthetic and environmental benefits and mitigate tree loss (DO1).

The Overlay provides guidance on where regulated and significant trees are retained and requires tree-damaging activity in connection with other development to satisfy criteria relating to accommodating reasonable development and, in the case of significant trees, demonstrating options have been considered to prevent substantial tree-damaging activity occurring (PO1.4).

8.4.4 Gas and Liquid Petroleum Pipelines and Gas and Liquid Petroleum Pipelines (Facilities)



These overlays seek to mitigate risk of community exposure to a potential hazard from the failure of a gas or liquid petroleum pipeline or facility. This includes by locating and designing development that poses an explosive risk (such as electricity infrastructure) such that it avoids escalating the potential for and effects of gas and liquid petroleum pipeline failure (PO1.3)

The proposal is of a Class of Development / Activity under the Code requiring referral to the Chief Executive of the Department of the Minister responsible for administering the *Petroleum and Geothermal Energy Act 2000* for expert assessment and direction to the relevant authority in relation to:

- a) potential safety issues related to development or
- b) the potential for development to adversely impact upon the lawful continued operation of strategic infrastructure (gas and liquid petroleum pipelines).

Figure 16: Gas and Liquid Petroleum Pipeline Overlay and Gas and Liquid Petroleum Pipeline (Facilities) Overlay

8.4.5 Water Resources



This Overlay applies to Mutton Cove and two locations adjacent the existing Pelican Point Substation.

The Overlay seeks to protect the quality of surface waters (DO1) and maintain the conveyance function and natural flow paths of watercourses to assist in the management of flood waters and stormwater runoff (DO2).

Figure 17: Water Resources Overlay

8.5 General Development Policies

The following General Development Policies are particularly relevant for this development.

8.5.1 Infrastructure and Renewable Energy Facilities

The policies aim to ensure the efficient provision of infrastructure networks and services in a manner that minimises hazard, is environmentally and culturally sensitive and manages adverse visual impacts on natural and rural landscapes and residential amenity (DO1) by:

- Locating and designing development to minimise hazard or nuisance to adjacent land uses (PO1.1) and the visual impact of above-ground infrastructure from townships and public roads (PO2.1).
- Reinstating and revegetating surfaces exposed by earthworks associated with the installation of pipework, substations and other ancillary plant to reduce visual impacts (PO2.3).
- Locating electricity infrastructure to minimise visual impacts by grouping utility buildings and structures with non-residential development where practicable and minimising disturbance of native vegetation or biodiversity (PO5.1).

8.5.2 Design in Urban Areas

These policies aim to ensure development in urban areas is contextual, durable, inclusive and sustainable, including by incorporating water sensitive design:

- Development likely to result in risk of export of sediment, suspended solids, organic matter, nutrients, oil and grease include stormwater management systems designed to minimise pollutants entering stormwater (PO42.1).
- Water discharged from a development site is of a physical, chemical and biological condition equivalent to or better than its pre-developed state (PO42.2).
- Development includes stormwater management systems to mitigate peak flows and manage the rate and duration of stormwater discharges from the site to ensure that development does not increase peak flows in downstream systems (PO42.3).

8.5.3 Interface between Land Uses

Development should be located and designed to mitigate adverse effects on or from neighbouring and proximate land uses (DO1), including by:

- Ensuring external lighting is positioned and designed to not cause unreasonable light spill impact on adjacent sensitive receivers (or lawfully approved sensitive receivers) (PO6.1).

9. PLANNING ASSESSMENT

In accordance with the Essential Infrastructure assessment pathway, the application has been assessed against the relevant provisions of the Code, which are contained in **Appendix 1**, and other planning instruments where relevant.

9.1 Land Use

The proposed Pelican Point Substation and associated works will not result in any change of land use. The development represents essential infrastructure required to support a strategic employment related use (ONS/SCY) envisaged within the Strategic Employment Zone (DO1, PO1.1). Electricity substations are also listed as an envisaged use in the Strategic Employment Zone (DPF1.1).

While the proposed Lefevre East Substation and associated works are not envisaged uses in a Conservation Zone or Open Space Zone, the proposal represents a relocation and expansion of existing essential infrastructure (Lefevre Substation) within the Conservation Zone, as illustrated below.

Siting of the new substation adjacent the existing substation and on land that has been substantially disturbed is orderly and prevents encroachment and fragmentation of the primary conservation areas of Mutton Cove and the coastal interface.



Figure 18: Detail of zoning / current use and indicative footprint of proposed Lefevre East Substation

9.2 Siting, Appearance and Interfaces

Zone policies and General Development Policy – Infrastructure and Renewable Energy Facilities DO1 and PO2.1 seek to minimise visual impacts and hazards and nuisance to adjacent development and coastal environments.

Located within an established and intensifying industrial precinct, the proposed substations represent an expansion of existing electricity infrastructure and are separated from the nearest residential properties by more than 1 km. The proposed substations are appropriately located adjacent existing substations of a similar or greater scale, with visibility largely limited to users of the surrounding naval shipbuilding yards. The relocation and undergrounding of the existing overhead transmission lines will also improve visual amenity, including within Mutton Cove.

Overall, the proposal is appropriately sited and scaled, will have a negligible impact on local amenity, and is compatible with the existing industrial character and operation of surrounding land uses.

9.3 Stormwater Management

Planning policy seeks the appropriate management of stormwater, both during the construction and operation of new development, to prevent environmental impacts to adjoining land and/or coastal waters (i.e. diminution in water quality, contamination etc). The development application included two stormwater management reports being for the substation expansion works at Pelican Point (WGA) and the new Lefevre East substation (Enerven).

Each report considers local site conditions, pre and post development outcomes, tidal influence and levels, detention and water quality requirements.

Both sites are located within proximity to the Port River and the Adelaide Dolphin Sanctuary, situated on land adjacent the SCY project (previously approved under an EIS process in 2025) and existing ONS (at the existing Lefevre Substation).

Each development site – to be connected via underground electricity transmission cables – is considered below:

9.3.1 Pelican Point

The stormwater management plan seeks to address the proposed Bay 5 works, involving an increase to new pavement areas and batters (7,250m²), which would reduce the existing pervious area and (if not managed) increase runoff from the site.

In its initial assessment, the WGA report notes that the performance of the site stormwater drainage network may be affected by tide levels (based on previous studies). The stormwater management solution was then based on meeting a range of performance measures: water quality targets (pollutants, sediment load), flood protection (above 1% AEP), flood mitigation, climate change, drainage capacity and discharge quantity). The guidance of the Coast Protection Board, Environment Protection Authority and Port Adelaide Enfield Council was also noted.

To satisfy these guidelines, stormwater is proposed to be managed on-site. Runoff from Bay 5 is to be directed into storage areas, with sufficient capacity for minimal spill, then discharge from the storage areas (580m³) via evaporation and infiltration only, or in storm events/overflow situations, directed to an existing low-lying area to minimise impacts to the general environment (refer Section 5.3: WGA report).

For construction purposes, it was recommended that the contractor prepare and implement a Construction Erosion and Sediment Control Plan. This should be reflected in conditions of approval.

9.3.2 Lefevre East

The stormwater management plan seeks to address the proposed new Lefevre East Substation with two key design elements: major flood risk and detention storage sizing and drainage (Refer Section 4, Enerven).

In its initial site investigations, Enerven noted that the *existing retention pond is insufficient for detention usage...due to the increase in impervious area from the proposed Lefevre East Substation* (p14). A new underground On-Site Detention basin (OSD) is proposed to provide the additional capacity required, with the existing retention pond to be decommissioned. In addition, a new stormwater detention pond with a minimum storage capacity of 160m³ would be constructed.

Careful consideration would need to be given to finished surface levels vis-à-vis adjacent land and infrastructure, and to ensure existing flow paths and drainage networks are not impacted and/or inadvertently restrict site access. At the baseline level, it is proposed to limit post-development flow rates to the pre-development flow rates for the minor 10% AEP critical storm and major 1% AEP storm events.

Contaminated run-off from within the substation would be intercepted, based on practical and cost-effective water quality techniques (such as cartridge filters, litter baskets etc), subject to detailed design. Oily water from reactor equipment will be collected and diverted into the existing oil/water separator tank at Lefevre Substation (p15), whilst a new stormwater main will be utilised to discharge peak flows to the Port River such that a larger detention basin is not required.

9.3.3 Summary

Both stormwater management design solutions have been reviewed by the Coast Protection Board and the Port Adelaide Enfield Council. No objection was raised by CPB, subject to conditions in relation to isolation values and procedures being implemented in the case of a reactor fire, and that a SEDMP be implemented.

The Council raised concerns in relation to the stormwater water quality treatment measures for the Lefevre East substation, the need to confirm water quality targets and related site levels to ensure future flood risk is minimised.

In response to the Council's concerns, the applicant confirmed that the substation design parameters will accord with the Planning and Design Code. The applicant advised that subject to further detailed design, *the final treatment configuration [and water quality] measures will be included in the civil and stormwater documentation when the detailed drainage design is completed.*

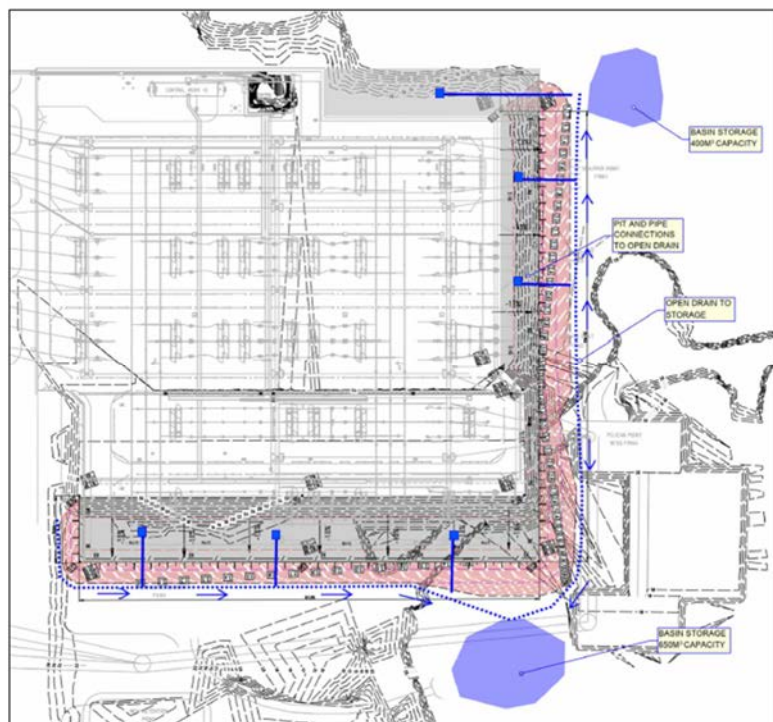


Figure 19: Pelican Point, Bay 5 Stormwater infrastructure

The applicant acknowledged the need for further design work to finalise the tailwater specification (that is, the outlet level and capacity, additional storage and backflow protection), including whether a flood gate or non-return arrangement is required at the Port River outlet.

Overall, both plans demonstrate that sufficient compliance with current policies can be achieved. A final Stormwater Management Plan will need to be prepared for the Lefevre East substation to ensure water treatment measures are incorporated into the final detailed design of the facility prior to commencement of construction. This should be reflected in conditions of approval.

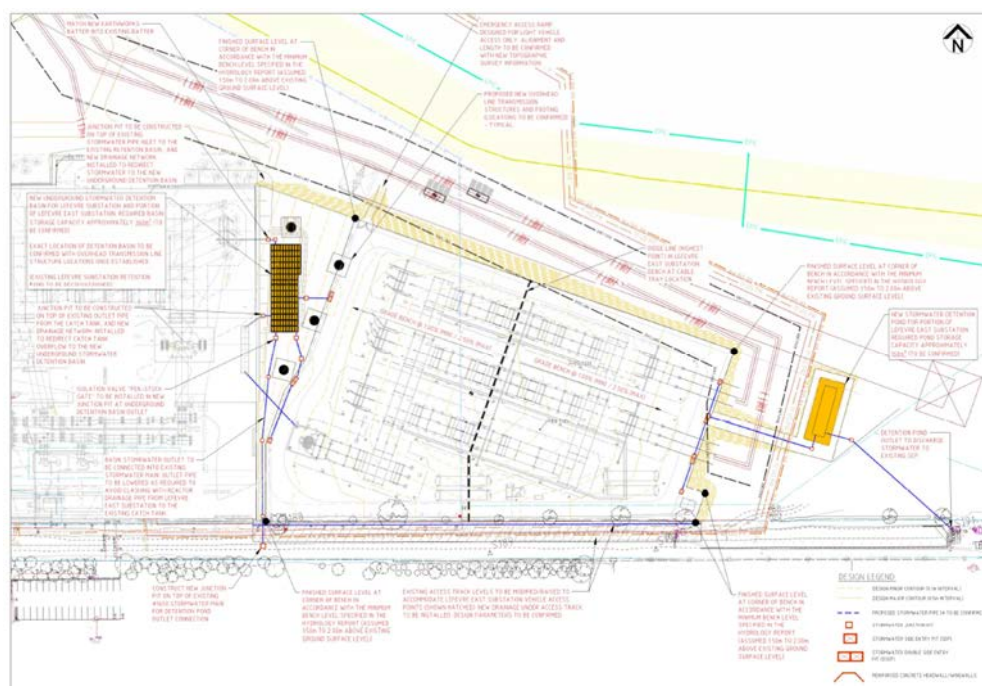


Figure 20: Lefevre East Substation, Stormwater infrastructure

9.4 Regulated and Significant Trees / Biodiversity

The Native Vegetation Act does not apply to location.

The locations proposed for the substations and the alignment of the underground 275kV electricity transmission lines were the subject of two Arboricultural Impact Assessments prepared by accredited arborists in January 2026 and May 2026 (**Attachments 1F and 1G**).

The Council and the respondents queried inconsistencies between the two reports, including different numbering of trees. In their response to these comments, the applicant clarified the rationale for undertaking two assessments and the discrepancies between the two reports as follows:

- *We acknowledge inconsistencies between the two reports. These differences reflect different approaches to tree identification, classification and assessment.*
- *The Succession Ecology report identifies trees on the site. However, it does not include the notional root zones or structural root zones required to assess development impacts. This means tree impacts could not be fully determined for planning purposes.*
- *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.*

Collectively the reports provide an assessment of impacted trees, and identification of tree protection measures for those not directly impacted, consistent with the intent of the Regulated and Significant Tree Overlay.

Of the 39 regulated trees assessed, the arborist determined that 34 were directly impacted and required removal (3 Significant Trees and 31 Regulated Trees) and that none of the impacted trees made an 'important visual contribution to local character and amenity', were of high ecological value or provided an important habitat, which would merit their retention under PO1.1 or PO1.2.

The arborists considered the proposed tree-damaging activity to be reasonable to accommodate a reasonable development in the location, satisfying PO 1.4(a) of the Overlay.

PO1.4(b) of the Overlay requires that, in the case of significant trees, all reasonable development options and design solutions be considered to prevent substantial tree-damaging activity occurring. The impacted significant trees (trees 51, 56 and 61) are within the footprint of the proposed Lefevre East Substation, as shown in **Figure 7**. Alternative siting and design of this substation is limited by the:

- technical need to be adjacent the existing substation,
- limited corridor available for relocation of the 275kV electricity lines and gas pipelines while avoiding the footprint of the approved SCY and ONS facilities, and
- explicit aim of the applicant to avoid the sensitive environments of Mutton Cove Conservation Reserve and coastal frontage to the Port River.

Notwithstanding, the URPS arborist report notes that detailed design will consider all reasonable measures to avoid impacting regulated and significant trees where practicable.

The applicant has elected to offset the removal of trees through replacement planting in accordance with the Act, including use of species indigenous to the area as recommended by Council and representors.

It is recommended that conditions of approval reflect the need for:

- tree protection measures recommended in the arborist report to be in place during construction to prevent incidental damage to the 2 significant trees and 3 regulated trees identified for retention;
- preparation of a final landscaping plan demonstrating the proposed replacement planting of trees, including species, size, and maintenance schedule; and
- replacement trees to be planted within a reasonable timeframe following completion of works.

9.5 Hazards - Building Near Gas and Petroleum Pipelines

The proposed development is within the vicinity of gas pipelines licensed under the Energy and Resources Act 2000, namely:

- The Moomba-Adelaide Pipeline (Epic Energy)
- Port Campbell-Adelaide Pipeline (South East Australia (SEA) Gas)

The matter was referred to DEM for expert advice and direction regarding potential risks to public safety, the environment and security of energy supply (Hazards – Building Near Gas and Petroleum Pipelines Overlay).

DEM determined that the works pose a potential risk to public safety and the pipelines due to infrastructure crossing the pipelines, digging in the vicinity of the pipelines, and the potential for electrical interference associated with the installation of cabling and other high-voltage infrastructure in the vicinity of the pipelines.

Notwithstanding, as detailed in **Attachment 3C**, DEM were satisfied that these potential risks are capable of being addressed through detailed design and undertaking a Safety Management Study with the pipeline owners, with a recommendation that conditions be applied to any approval relating to the technical requirements to be demonstrated in final detailed design.

The proposed conditions of approval are supported.

10. CONCLUSION

The proposed development will complement and support existing and planned industrial scale uses located on the northern Lefevre Peninsula, particularly the naval shipbuilding activities that it facilitates. The proposed siting and detailed design will seek to minimise tree-damaging activity while achieving required stormwater quality targets, negating safety risks associated with building in proximity to gas pipelines and improve the visual amenity through removal of overhead transmission lines through Mutton Cove.

Pursuant to Section 130 of the *Planning, Development and Infrastructure Act 2016*, and having undertaken an assessment of the application against the relevant provisions of the Planning and Design Code and State Planning Policies, the application is generally in accordance with its provisions for the reasons outlined.