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Fiona Selleck
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Dear Fiona

Response to Council Comments and CPB Referral: ANI 275kv DA 26016431

Introduction

URPS continues to act on behalf of Australian Naval Infrastructure (ANI) and ElectraNet for DA 26016431. The DA involves:

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.

The development application has been referred to the Coastal Protection Board and the City of Port Adelaide Enfield (Council) for comment.

This letter summarises the referral feedback and responds where required.

Referral Summary and Response

Coastal Protection Board

The Coastal Protection Board does not object to the development. It recommends conditions and advisory notes.

They include:

Conditions

- 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,

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. This includes protection from direct physical harm and changes in water quality. Contractors should be made aware of the Adelaide Dolphin Sanctuary Act and the 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.

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.

City of Port Adelaide Enfield

Council does not object to the proposed development. Council makes recommendations about:

- Stormwater Management
- Environmental Management
- A response to these matters follows.

Stormwater Management

The table below provides a response to each item raised by Council:

Council comment	Applicant Response
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.	ElectraNet has completed a preliminary stormwater-quality assessment for the existing Lefevre Substation and proposed Lefevre East Substation. The design adopts the stormwater-quality treatment objectives applicable under the Planning and Design Code. Preliminary MUSIC modelling has been undertaken to demonstrate that the proposed stormwater treatment approach can achieve the applicable water-quality targets. The final stormwater design will include appropriate treatment measures to achieve the applicable targets. It will also be coordinated with ANI's overarching NPSCY

Council comment	Applicant Response
	Stormwater Management Plan when that document is available to the design team.
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).	The preliminary design has progressed beyond deferring stormwater treatment for later consideration. The updated Preliminary Stormwater Design Report identifies a preliminary stormwater treatment approach and assesses its performance using MUSIC modelling. The modelling indicates that the proposed approach can achieve the applicable water-quality treatment targets. The treatment measures will be refined through detailed design. They will then be included in the final civil and stormwater drawings following completion of the new stormwater main design, final pit and pipe survey information and detailed drainage design.
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.	The stormwater-quality design will meet the applicable treatment targets specified by the Planning and Design Code. Preliminary MUSIC modelling has been completed to demonstrate that an appropriate treatment approach can achieve those targets. The treatment configuration will be refined through detailed design. The final solution will continue to respond to the applicable Planning and Design Code requirements. The final treatment measures will be included in the civil and stormwater documentation when the detailed drainage design is completed.
On site detention in relation to the proposed southern substation works is proposed despite being unnecessary given the site's	The current design does not propose a conventional detention basin for the purpose of limiting post-development peak

Council comment	Applicant Response
proximity and ability to discharge directly to the Port River.	discharge to the pre-development rate. Because a new dedicated stormwater main will discharge directly to the Port River, peak-flow detention is not required on that basis. The proposed 93 m³ offline underground storage is primarily an emergency oil-containment measure for the new reactor. It also provides secondary stormwater storage when elevated tides constrain the Port River outlet. The underground drainage network is calculated to store about 10 mm of rainfall between low- and high-tide conditions. The report recommends that the separate design of the new Port River stormwater main consider whether additional storage is required to manage future tidal conditions and avoid frequent overflow toward Mutton Cove.
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.	Tailwater has now been expressly considered, although the detailed design response to the future tailwater condition remains to be finalised. The hydrology assessment adopts a current mean high water springs level of 0.95 m AHD and a future level of 2.38 m AHD. The future level includes allowances for sea-level rise, land subsidence and storm surge and exceeds the historical maximum tide of approximately 2.345 m AHD identified in the assessment. The preliminary DRAINS assessment models 0.95 m AHD as the current tailwater condition. It models 1.70 m AHD as the high-tide operational condition. This corresponds with the existing Lefevre Substation retention pond spillway level. An initial test at the future 2.38 m AHD

Council comment	Applicant Response
	tailwater level found insufficient pressure head to convey the 1% AEP event through the proposed gravity system. Accordingly, the detailed design of the new stormwater main must resolve the future tailwater condition. This includes outlet level and capacity, additional storage and backflow protection. A flood gate or non-return arrangement is proposed at the Port River outlet. The DRAINS model will be reviewed when the new main design and relevant survey data are available. The separate TUFLOW assessment confirms that the proposed about 2.9 m AHD bench remains above the modelled future flood level. It provides more than 300 mm freeboard. However, this does not remove the need to resolve internal drainage performance under the future tailwater condition.

Environmental Management

Arborist Report and the Ecology Report

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

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.

The two reports reached different conclusions about the number and classification of affected trees. This 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 because its trunk circumference is less than 1 metre and is not controlled under the <i>Planning, Development and Infrastructure Act 2016</i>

The URPS assessment identifies more Regulated and Significant Trees than the Succession Ecology report. It 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 and Design Code. This means they are not Regulated or Significant Trees worthy of retention. They are therefore suitable for removal, subject to approval.

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.

Replanting replacement trees

Council requested confirmation about regulated and significant trees proposed for removal. This included whether replacement planting is proposed, whether financial offsets are intended, and how revegetation will occur locally.

As noted above, 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.

The proponent expects a condition to this effect.

Revegetation of Mutton Cove

Council raised concerns about revegetation of Mutton Cove.

It is a requirement of DEW that the land be rehabilitated to its natural state. This requirement is set out in the landowner consent.

The proponent will action this requirement.

Impacts on 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.

Some concerns raised appear to reflect uncertainty about the proposed works.

The proposal includes 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

Council 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 will remain in situ. These deeper footings typically extend about 10 to 15 metres below ground level.

Retaining the deeper foundation components will minimise ground disturbance. It will 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, acid sulphate soils are not a determinative Code issue for this assessment. The Planning and Design Code does not require a statutory referral to the EPA for this matter.

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 controls.

Conclusion

This letter summarises and responds to the referral responses received from the Coastal Protection Board and the City of Port Adelaide Enfield.

The referral responses do not raise any in-principle objection to the proposal.

The matters raised are addressed through the detailed responses and appropriate conditions of approval.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Brigitte Williams', with a stylized flourish at the end.

Brigitte Williams
Senior Consultant