

From: Tony Bazeley <tonyb@tonyb.id.au>
Sent: Tuesday, 11 August 2026 11:07 AM
To: DHUD:SPC Reps
Cc: Port Adelaide Residents Environment Protection Group
Subject: PAREPG_Response to ANI Elecrtanet/DA_26016431
Attachments: PAREPG_Electranet_Response_DA26016431_final.pdf

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Please find attached a response to the above Development Application from the Port Adelaide Resident's Environment Protection Group

Best regards

Tony Bazeley
0449 759 643

Sent with [Proton Mail](#) secure email.



Submission :DA_26016431 Construction of new and expanded substations, relocation and undergrounding of 275kV electricity transmission lines, and tree damaging activity

The Port Adelaide Resident's Environment Protection Group (PAREPG) been involved with Mutton Cove since the 1990's. PAREPG and other local groups, including the Friends of Mutton Cove have participated in re vegetation work and at one stage hosted regular coastal study groups from all three universities.

PAREPG's view is the Planning Code under which this application is being assessed is dated and alarmingly incorrect.

The problem

In May 2016 a dramatic breach of the levy wall changed the nature of the Mutton Cove. Prior to the breach Mutton Cove internals were protected from the force of coastal elements, but this is no longer the case. Tidal flows fill the area twice daily and high tides coupled with wind regularly form waves which erode the boundary walls.



Figure 1: Mutton Cove northern boundary showing erosion of the walking trail on the northern wall. Source: [Google maps](#)

Currently the levee has two major breaches and is now being eroded on both the river boundary and internally. Severe levee erosion is occurring to such an extent at several locations that further breaches will occur in the near future.

Once a breach occurs the force of the water rapidly expands the gap, allowing larger volumes to enter the Mutton Cove interior. Decay of accumulated subsurface organic matter has lowered Mutton Cove's floor level accentuating the problem

The managing authority, the Department for Environment and Water, has repeatedly stated it has no intention of repairing the levee.

Consequently any development in Mutton Cove is exposed to both a current and increasing risk of wind and tidal forces

The current application

The application does recognise a need to elevate the "Eastern Substation":

The Site's close proximity to the Port River the finished levels for the Lefevre East Substation bench will likely be dictated by sea level rise and climate change factors (to be confirmed with the Lefevre East Substation Hydrology Report).

Information provided by the City of Port Adelaide Enfield Council who previously owned and maintained the surrounding infrastructure (prior to the acquisition by ANI) has suggested finished bench levels should be between 3.10m (AHD) and 3.35m (AHD) to comply with the SA Planning and Design Code. Based on the information provided, the finished bench levels would be approximately between 1.50m – 2.00m above the current existing ground surface levels for The Site.

And:

Based on available information at the time of this report, it is highly likely the finished levels for the Lefevre East Substation may be 1.00m – 2.00m above the existing access track levels where vehicle access points to the Lefevre East Substation are directly adjacent to.

Coordination with the asset owner (ANI) should be undertaken as a priority to confirm if the existing access track levels can be raised/modified to suit the Lefevre East Substation development.

Raising the existing access track levels would likely impact the existing overland flow path between Mersey Road North and the Port River, it is anticipated that additional drainage works would also be required to the existing access track to accommodate the Lefevre East Substation development.

However we note the contrast between the Department of Infrastructure and Transport's recent approval for the tunnel spoil dump at Gillman which incorporated "Earthworks to fill land to a minimum 3.7m AHD". The Gillman earthworks dump is at its closest point some 600m from and sheltered from direct tidal action.

It is not sufficient to simply estimate that "highly likely the finished levels for the Lefevre East Substation may be 1.00m – 2.00m above the existing access track levels".

PAREPG are not claiming coastal engineering expertise, but noting that the development includes critical state infrastructure, it would be highly unusual if the application was not referred to the Coast Protection Board.

Acid sulphate soils

As noted above the decay of accumulated subsurface organic matter is a feature of the area. Subsequent atmospheric exposure has produced patches of acid sulphate soils in the Park. Moreover disturbing such sediments potentially results in increased acid sulphate soil production.

The proponent acknowledges the probability of acid sulphate soils and broadly refers to solutions. PAREPG's view is the matter should be referred to the EPA.

Significant and regulated tree destruction

The applicants identify a number of significant and regulated trees for destruction. PAREPG notes a significant difference between the proponent's agent report and that of Succession Ecology.

PAREPG believes it is clear that a detailed justification is required for each tree the proponent is proposing to destroy.

PAREPG are concerned at the wholesale destruction of many native species in the area, irrespective of their regulatory status. The whole defence area is becoming transformed into a concrete desert, contrary to State and Local government policies.

Environmental investigations

The proponent's desire to revamp the storm water detention basin between the eastern and current substations and the erection of lighting mono-poles will apparently result in not only the destruction of regulated trees but a number of other native species including *Myoporum insulare*.

The basin is not devoid of environmental utility, particularly as it is the only local fresh water occurrence in the area. It provides habitat for a number of bird species and the calls of unknown frog species have been observed at the site. Proceeding uninformed is a precursor of disaster.

PAREPG's view is that an investigation of the local environmental value of the site should be made before any approval occurs, and any modification should proceed in a demonstrably sensitive manner. For example the moving the lighting mono-poles inside the substation boundary as in the existing substation would not appear to present an insurmountable design challenge.

Lay down area

PAREPG understands a lay down area to the east of the eastern substation, in the Mutton Cove Conservation Reserve is proposed but does not form part of the application. Apparently the area is to be constructed of compacted rubble, and probably fenced.

Problems of effective vegetation restoration after compaction and the emergence of acid sulphate soils referenced above are apparent. PAREPG's recommendation is that an alternative laydown area be sought, perhaps on the triangular section to the east which was transferred to the Commonwealth.

Summary:

From its detailed knowledge of Mutton Cove and its perimeters, PAREPG recommends that this Development Application is only accepted if the following are met:

- That the Coast Protection Board reviews and sets the required finished bench levels of the LeFevre East Substation, given its vulnerability with decaying Port River levee banks

- That the EPA provides advice on the avoidance of increasing the exposure of acid sulphate soils by any earthworks undertaken
- A detailed justification is provided for each tree proposed to be destroyed and that the absolute minimum of vegetation destruction is required
- An investigation of the local environmental value of the site should be made before any approval occurs, and any modification should proceed in a demonstrably sensitive manner
- An alternative lay down area be located outside of the Mutton Cove Conservation Reserve

PAREPG representatives would like to appear at the hearing.

From: catherine@portriver.au
Sent: Tuesday, 11 August 2026 7:43 AM
To: DHUD:SPC Reps
Subject: Development Number: 26016431 ElectraNet and Australian Naval Infrastructure
Attachments: FPR response to DA 11.8.2026.pdf; Representation form - Friends of Port River.pdf

You don't often get email from catherine@portriver.au. [Learn why this is important](#)

Hi

Friends of Port River are responding to this DA for 'construction of new and expanded substations, relocation and undergrounding of 275kV electricity transmission lines, and tree damaging activity' and seeking to be heard by SCAP.

Thanks

Catherine

Catherine McMahon
Convenor, [Friends of Port River](#)
0413 578086



REPRESENTATION FORM

PLANNING, DEVELOPMENT AND INFRASTRUCTURE ACT 2016, S130 – ESSENTIAL INFRASTRUCTURE

Development Number:	26016431		
Applicant:	ElectraNet and Australian Naval Infrastructure		
Nature of Development:	Construction of new and expanded substations, relocation and undergrounding of 275kV electricity transmission lines, and tree damaging activity		
Subject Land:	Mersey Rd N, Osborne & Pelican Point Rd, Outer Harbor – see application for details		
Contact Person:	Fiona Selleck	Phone Number:	7133 1754 / 1800 752 664
Close Date:	Tuesday 11 August 2026		

My name: Catherine McMahon **My phone number:** 0413 1578086

Primary method(s) of contact:

Email: catherine@par-triver.au

Postal Address: 132 Mead St, Peterhead 5016

You may be contacted via your nominated PRIMARY METHOD(S) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

My interest in the development is as (please tick one):

- ☐ owner of a local property (Address: _____)
- ☐ occupier of a local property (Address: _____)
- ☒ representative of a company / organisation affected by the proposal – Friends of Pat River
- ☐ private citizen

My view of the development (please tick one):

- ☐ I support the development
- ☐ I support the development with some concerns
- ☒ I oppose the development

My comments:

Submission attached to email

Please nominate if you wish to be heard (appear before the State Commission Assessment Panel):

- ☒ I wish to be heard in support of my submission:
- ☒ by appearing personally
- ☐ by being represented by the following person _____
- ☐ I do not wish to be heard in support of my submission

Signature: C McMahon **Date:** 10/8/2026

PLANNING, DEVELOPMENT AND INFRASTRUCTURE ACT 2016

SECTION 130 – ESSENTIAL INFRASTRUCTURE

Development Number: 26016431

Applicant: ElectraNet and Australian Naval Infrastructure

Nature of Development: Construction of new and expanded substations, relocation and undergrounding of 275kV electricity transmission lines, and tree damaging activity

Background

Approximately eight years ANI contacted Port Adelaide Residents Environment Protection Group (PAREPG) and Friends of Port River (FPR) seeking regular engagement with us as part of their social licence. From December 2023, we met with ASA representatives and from May 2024 those meetings became monthly with ANI and ASA reps. It was therefore disappointing to find that while ANI is requiring ElectraNet to relocate its transmission lines, and upgrade its substation capacity, that ANI has not sought to brief PAREPG and FPR about this project's DA. FPR and PAREPG had our first meeting with ElectraNet, as ANI's client, during this notification period, after the DA has been developed and submitted.

Fyi Epic Energy has engaged with Green Adelaide, Trees for Life, FPR and PARPEG about relocation of their gas pipeline for the AUKUS development.

In assessing this project it's critical to consider tidal flows which generally vary between 0.2-0.3m and 2.7m (Figure 2)¹ along the Port River, storm surges, rising sea levels, the risk of further failure of the Mutton Cove seawall and the potential impact on the environment. This DA does not demonstrate sufficient understanding of these complexities.

Issues of Concern

Mutton Cove

In all the years we've engaged with ANI, Mutton Cove has been a constant topic of discussion. FPR (previously Estuary Care Foundation) and PAREPG have been very critical of the State Government's failure to maintain the seawall at Mutton Cove, leading to its first major breach in 2016, subsequent breaches and near breaches, and the erosion of the N, W and S banks of Mutton Cove since then. (See Figures 3 and 4 for main seawall breach)

Despite ANI, Flinders Ports, the City of Port Adelaide Enfield, and the Department of Environment, contributing \$20K each towards an analysis of coastal risks and identification of adaptation options, the 2021 report of that study has not been provided to the funding partners and the State Government has continued to allow the seawall and banks to fail.

Recent 2026 storms led to overtopping of the bank at the northern end, (Figure 5) there's ongoing collapse of the embankment on the west side (Figure 6) and there's extensive flooding at the southern end, together with stormwater ponding by the Lefevre substation (Figure 7) and east of tower D121984Q506 (Figure 8).

¹ Note: Figures 2 to 14 have been grouped together. Figure 1 is on pp3 of this document.

During our briefing with ElectraNet we were advised that a lay down area was anticipated east of the new substation and south of the SEA Gas pipeline (Figures 9 & 10), though there is no mention of this in the DA.

This DA advises that a new substation will be built adjacent to the Lefevre substation, two transmission towers will be removed in Mutton Cove (along western bank – Figures 11-13), there will be undergrounding of 275kV electricity transmission lines through Mutton Cove (south of the SEA Gas pipeline) and trees will be removed.

Along the Port River, and into Mutton Cove, (Figure 2 shows tides for some spring and summer months in 2026), there are relatively short periods and limited numbers of days when the area for trenching and material storage will not be abutting tidal inflows. It's not apparent that the following methods for undergrounding cable will be appropriate or effective.

“During construction:

- *Use of trench shoring to prevent trench/soil collapse.*
- *Use of geofabrics to prevent washing away or deterioration of controlled backfill and bedding materials*
- *Erosion and Sediment Control*

With significant amount of large soil movements associated with main cable trench and laying activities, soil management plans will be developed to provide a quick guide on site for the typical sediment control arrangement.

Under construction activities the following controls will be in place;

- *All spoil is to be swept at the end of each shift or when site conditions begin to deteriorate.*
- *Once excavated all spoil is to be placed into either a small truck/skip bin or a stockpile. Soil stock piles which are retained beyond a shift, or when inclement weather is imminent will be contained with erosion and sediment controls such as silt fence, sandbags or silt socks.*
- *In either circumstances, erosion and sediment controls are to be used at all times. Sediment control measures will consist of sand bags/silt socks/silt fences around the base of stockpiles and drains;*
- *If saw cutting techniques are to be used for the removal of asphalt it must be ensured that all saw cutting fluid is to be collected with a vacuum, and that stormwater drains are isolated with bunding controls (e.g. silt socks)”. (Development Application pp33)*

Impact on vegetation

We were pleased that the Succession Ecology report was provided to SCAP so that we could consider their proposals for trees to be retained, compared to the advice from URPS.

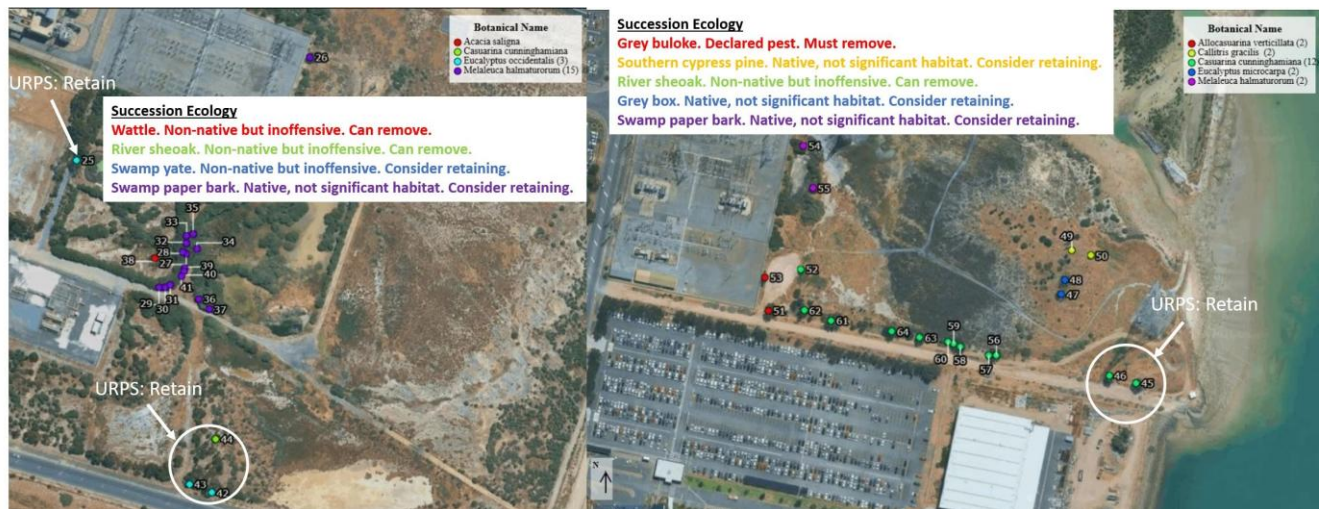


Figure 1: Comparison of URPS and Succession Ecology advice, from Facebook post by Alex Laratro

ANI advise that ElectraNet have a dedicated budget for revegetation as part of their program and we suggest SCAP ask them to outline their plans and whether they will undertake replacement planting or pay into a relevant tree fund, and if so which one.

FPR suggest SCAP also needs to be advised about plans for any lay down area, and how it will be revegetated after the project. (Figure 14)

Failure to consult relevant agencies

THE DA advises, that in URPS's opinion, no referral is needed to the Coast Protection Board or EPA and there is no mention of consultation with Green Adelaide (DEW).

The DA suggests that the Coastal zoning of Mutton Cove is "Not relevant. The Overlay covers a small portion of the project area/site where no works are proposed". FPR disputes that the impact on Mutton Cove is not relevant.

The DA suggest the Adelaide Dolphin Sanctuary Overlay is "Not relevant. The proposed works are land-based and are not expected to result in direct impacts to the Sanctuary or its values".

While the DA advises that the Overlay Hazards (Flooding) is relevant, it's not apparent how this project will ensure that there is no risk of seawater flooding to the ElectraNet infrastructure, nor how flooding when undertaking this project, or maintaining this infrastructure, will not adversely affect Mutton Cove.

Outcomes sought

What FPR want to see achieved is outlined below and recommends referral to the Coast Protection Board, the EPA and Green Adelaide to assist in advising SCAP:

- Development consistent with the environmentally sensitive nature of Mutton Cove and its Conservation zoning
- Development that takes account of sea level rise, storm surges and flooding risks and that does not further degrade the banks and structure of Mutton Cove
- How further deterioration of the western bank can be avoided during the removal of the 2 transmission towers in Mutton Cove
- How sediment can be prevented from flowing into Mutton Cove and the Port River

- How ElectraNet will ensure that any acid sulphate soils are managed appropriately
- How impacts on the coastal saltmarsh can be minimised during the trenching (up to 60m wide zone) and in the lay down area
- How Performance Outcome 2.3 will be achieved – “Surfaces exposed by earthworks associated with the installation of storage facilities, pipework, penstock, substations and other ancillary plant are reinstated and revegetated to reduce adverse visual impacts on adjacent land”
- Reduction in the number of trees to be removed, consistent with Succession Ecology advice (see Figure 1)
- Replacement planting, locally, if trees are removed and any payments as offsets to go to the City of Port Adelaide Enfield.

PORT ADELAIDE (OUTER HARBOR) – SOUTH AUSTRALIA

LAT 34° 46' S LONG 138° 28' E

Times and Heights of High and Low Waters

2026

Local Time

SEPTEMBER				OCTOBER				NOVEMBER				DECEMBER			
Time	m	Time	m	Time	m	Time	m	Time	m	Time	m	Time	m	Time	m
1 0015 0.39 0626 2.47 TU 1237 0.50 1828 2.28		16 0620 2.61 1238 0.52 WE 1820 2.08		1 0611 2.64 1245 0.52 TH 1816 1.85 2349 0.52		16 0042 0.51 0715 2.58 FR 1344 0.55 1924 1.85		1 0033 0.65 0732 2.39 SU 1411 0.84 1928 1.50		16 0123 0.76 0758 2.32 MO 1436 0.67 2024 1.67		1 0129 0.86 0813 2.12 TU 1450 0.80 2051 1.62		16 0222 0.81 0835 2.23 WE 1512 0.54 2127 1.88	
2 0029 0.44 0647 2.53 WE 1303 0.57 1845 2.12		17 0009 0.41 0643 2.58 TH 1300 0.61 1839 1.98		2 0629 2.59 1300 0.66 FR 1825 1.72 2356 0.52		17 0100 0.56 0737 2.48 SA 1403 0.65 1941 1.77		2 0050 0.72 0752 2.18 MO 1423 0.99 1936 1.44		17 0152 0.88 0827 2.14 TU 1514 0.80 2109 1.57		2 0215 1.01 0845 1.88 WE 1520 0.88 2204 1.64		17 0310 0.92 0915 2.03 TH 1549 0.65 2223 1.88	
3 0038 0.47 0707 2.55 TH 1327 0.67 1900 1.95		18 0026 0.45 0704 2.51 FR 1321 0.71 1855 1.88		3 0646 2.50 1313 0.82 SA 1829 1.62		18 0118 0.64 0758 2.34 SU 1426 0.78 1958 1.66		3 0103 0.88 0805 1.89 TU 1437 1.18 1855 1.34		18 0230 1.07 0909 1.90 WE 1622 0.97 2315 1.48		3 0337 1.21 0936 1.59 TH 1618 1.00		18 0423 1.05 1011 1.78 FR 1640 0.81 2341 1.89	
4 0045 0.50 0728 2.52 FR 1349 0.82 1910 1.77		19 0044 0.54 0725 2.38 SA 1344 0.87 1907 1.73		4 0004 0.56 0802 2.32 SU 1423 1.03 1915 1.52		19 0135 0.78 0819 2.14 MO 1454 0.98 2009 1.48		4 0015 1.12 0653 1.58 WE 1247 1.38 1609 1.43 2200 1.08		19 0419 1.33 1106 1.60 TH 1909 1.04		4 0023 1.71 0813 1.23 FR 1235 1.34 1849 1.09		19 0622 1.11 1149 1.50 SA 1758 0.99	
5 0053 0.57 0749 2.32 SA 1412 1.06 1901 1.56		20 0056 0.69 0745 2.17 SU 1407 1.10 1858 1.53		5 0102 0.68 0805 2.03 MO 1410 1.29 1801 1.49		20 0137 0.99 0835 1.85 TU 1545 1.26 1820 1.28 2334 1.14		5 0432 1.66 1017 1.10 TH 1608 1.66 2200 0.89		20 0227 1.69 0853 1.14 FR 1435 1.63 2050 0.91		5 0218 1.94 0950 0.92 SA 1528 1.43 2041 1.02		20 0122 1.97 0856 0.93 SU 1448 1.41 2001 1.09	
6 0047 0.68 0803 2.12 SU 1415 1.39 1719 1.48		21 0045 0.89 0749 1.87 MO 1400 1.42 1639 1.46 2315 0.97		6 0022 0.80 0703 1.75 TU 1216 1.40 1653 1.72 2325 0.75		21 0633 1.55 1035 1.46 WE 1525 1.60 2213 0.91		6 0413 1.97 1032 0.75 FR 1631 1.85 2216 0.75		21 0322 2.01 0955 0.79 SA 1554 1.80 2139 0.79		6 0321 2.19 1031 0.65 SU 1627 1.59 2137 0.92		21 0254 2.15 1022 0.63 MO 1645 1.53 2128 1.08	
7 0000 0.76 0710 1.80 MO 1147 1.59 1555 1.81 2305 0.63		22 0056 1.62 1008 1.45 TU 1528 1.80 2217 0.76		7 0549 1.76 1100 1.10 WE 1653 2.01 2312 0.59		22 0440 1.74 1015 1.08 TH 1608 1.91 2225 0.68		7 0426 2.25 1056 0.50 SA 1655 1.95 2233 0.66		22 0358 2.28 1036 0.49 SU 1641 1.90 2213 0.74		7 0405 2.39 1106 0.45 MO 1704 1.71 2217 0.84		22 0359 2.34 1116 0.38 TU 1739 1.62 2222 1.04	
8 0541 1.75 1019 1.29 TU 1611 2.17 2256 0.44		23 0440 1.76 0951 1.10 WE 1550 2.12 2221 0.53		8 0525 1.96 1107 0.75 TH 1711 2.20 2320 0.49		23 0440 2.03 1037 0.74 FR 1640 2.13 2244 0.53		8 0444 2.46 1118 0.35 SU 1715 1.98 2249 0.61		23 0428 2.48 1113 0.29 MO 1717 1.91 2240 0.73		8 0441 2.53 1136 0.34 TU 1735 1.79 2249 0.77		23 0446 2.50 1200 0.23 WE 1817 1.65 2302 0.97	
9 0516 1.89 1029 0.94 WE 1634 2.41 2306 0.34		24 0432 1.98 1008 0.80 TH 1614 2.35 2234 0.40		9 0525 2.17 1124 0.51 FR 1728 2.27 2329 0.46		24 0454 2.26 1102 0.48 SA 1706 2.22 2300 0.49		9 0502 2.60 1140 0.28 MO 1734 1.98 2304 0.58		24 0455 2.63 1146 0.19 TU 1748 1.85 2303 0.74		9 0513 2.61 1204 0.28 WE 1802 1.83 2319 0.72		24 0527 2.60 1239 0.18 TH 1846 1.64 2335 0.90	
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15 0557 2.58 1215 0.45 TU 1800 2.17 2353 0.39		30 0550 2.65 1221 0.39 WE 1803 2.01 2343 0.50		15 0023 0.46 0653 2.66 TH 1323 0.45 1905 1.93		30 0013 0.62 0652 2.66 FR 1343 0.52 1908 1.61		15 0100 0.68 0732 2.45 SU 1409 0.57 1955 1.74		30 0057 0.79 0746 2.31 MO 1432 0.73 2012 1.59		15 0145 0.74 0804 2.37 TU 1442 0.47 2045 1.87		30 0212 0.76 0819 2.15 WE 1440 0.51 2100 2.04	
				31 0022 0.64 0713 2.55 SA 1400 0.69 1918 1.54								31 0253 0.83 0845 1.98 TH 1459 0.51 2142 2.10			

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Datum of Predictions is Lowest Astronomical Tide

Times are in local standard time (UTC+09:30) or daylight savings time (UTC+10:30) when in effect

Moon Phase Symbols ● New Moon ○ First Quarter ○ Full Moon ● Last Quarter

Figure 2: Tide table Sept - December 2026



Figure 3: major (southern) seawall breach 18.6.2026



Figure 4: channel into Mutton Cove from major seawall breach 14.3.2026



Figure 5: seawater ponding after overtopping northern bank 18.6.2026



Figure 6: western bank 6.8.2026



Figure 7: channel of stormwater by Lefevre substation (on east side) 6.8.2026



Figure 8: stormwater ponding east of tower D121984Q506, 6.8.2026



Figure 9: Area south of SEA Gas pipeline, looking west 8.8.2026 – possible lay down area



Figure 10: Possible lay down area, seen from outside southern fence 8.8.2026



Figure 11: Most northerly transmission tower in Mutton Cove 26.7.2026 - to be removed



Figure 12: 2nd tower, from north, 26.5.2025 - to be removed



Figure 13: 2nd tower, from north, 6.7.2025 - to be removed

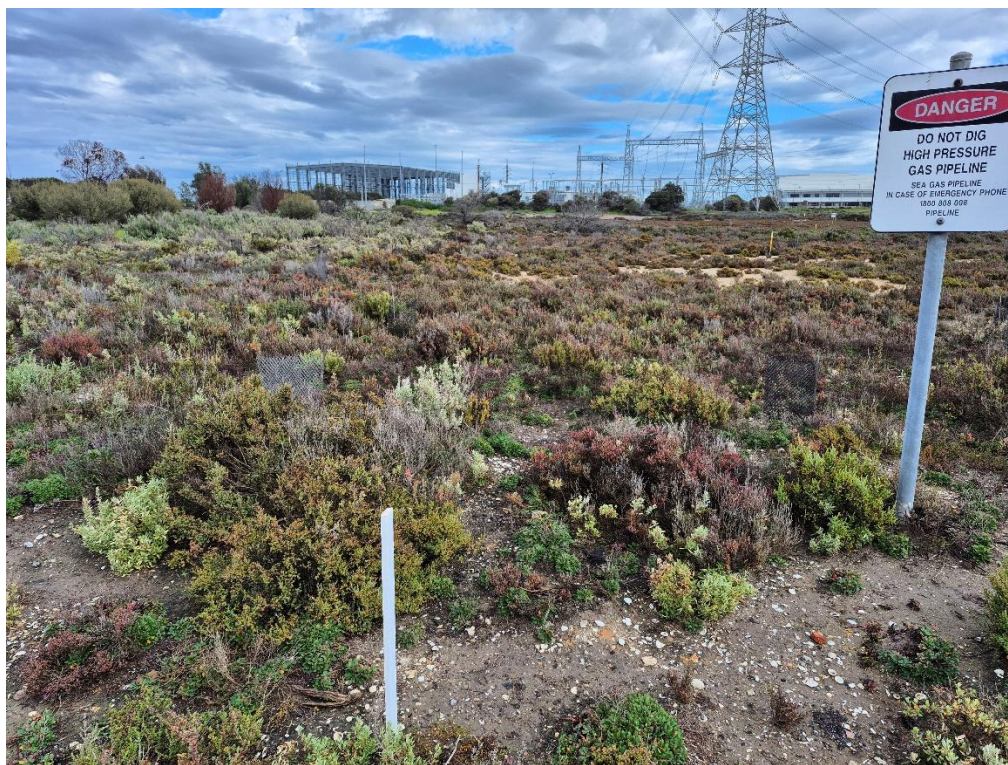


Figure 14: Existing vegetation south of SEA Gas pipeline