Notes re FPR presentation to SCAP

The proponent

- As mentioned in our submission, while FPR and PAREPG have monthly meetings with ANI, ASA and DP&C, we only learnt of the DA after it was lodged.
- During the public consultation period we met with ElectraNet, cut short by a sulphur fire in Port Adelaide

Concerns

- Harm to Mutton Cove, in relation to loss of the southern area, the impact on lay down area, the underground cable trenching, the removal of the transmission towers
- DA shows an inadequate assessment of risks to the project – changing environment with a failing seawall on east and eroding sand banks on N and W, made more vulnerable by storms and sea surges.
- Who will do rehab and reveg and when?

Referral

- While the URPS *Planning Statement* indicated that no referral was required to the Coast Protection Board, FPR is grateful for the conditions and advisory notes provided by the Board and the Council.
- It's notable that the Board's minimum finished floor levels are not to be achieved, while "mechanical, chemical and electrical equipment vulnerable to water ingress shall be raised to a minimum level of 3.55 metres AHD." If that strategy fails so will much of SA's electricity service provision.

Site

Re SCAP's understanding of the site, the Google Earth images provided by DHUD date back to January 2023, I'd recommend you seek a current Nearmap image.

In viewing figures 3 to 14 in our submission, you're seeing the largest but not the only breach of the eastern seawall and there's impending breaches further north.

The other boundaries aren't seawalls; they're sandy banks that are progressively eroding. The northern boundary gets overtopped in storms, and in high tides (e.g. 2.7m) seawater surrounds one of the transmission towers that's to be removed. On the western boundary where the services will go underground the bank is very narrow (Figure 6). Photos 9, 10 and 14 show what I thought was to be the lay down area, and some of it might be, but it looks like lots of that area will be lost to the new substation.

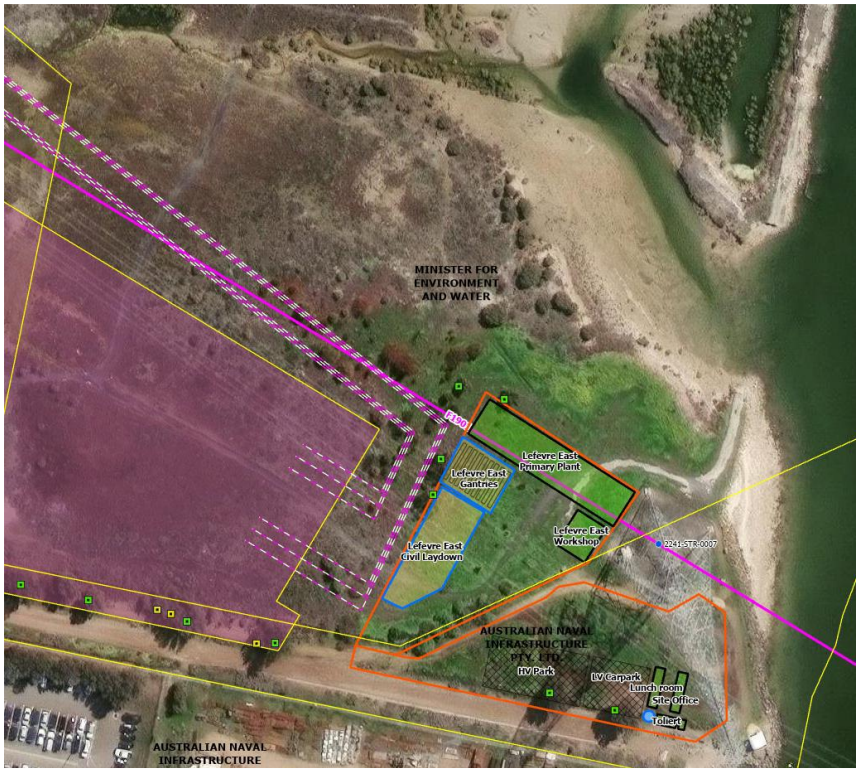
Providing today in hard copy Figure 2 Locality Plan (URPS), 2 images from ElectraNet presentation, Attachment 1C and 3 additional photos (Figures 15, 16 and 17) – 3 copies to share.

Figure 2: Locality Plan

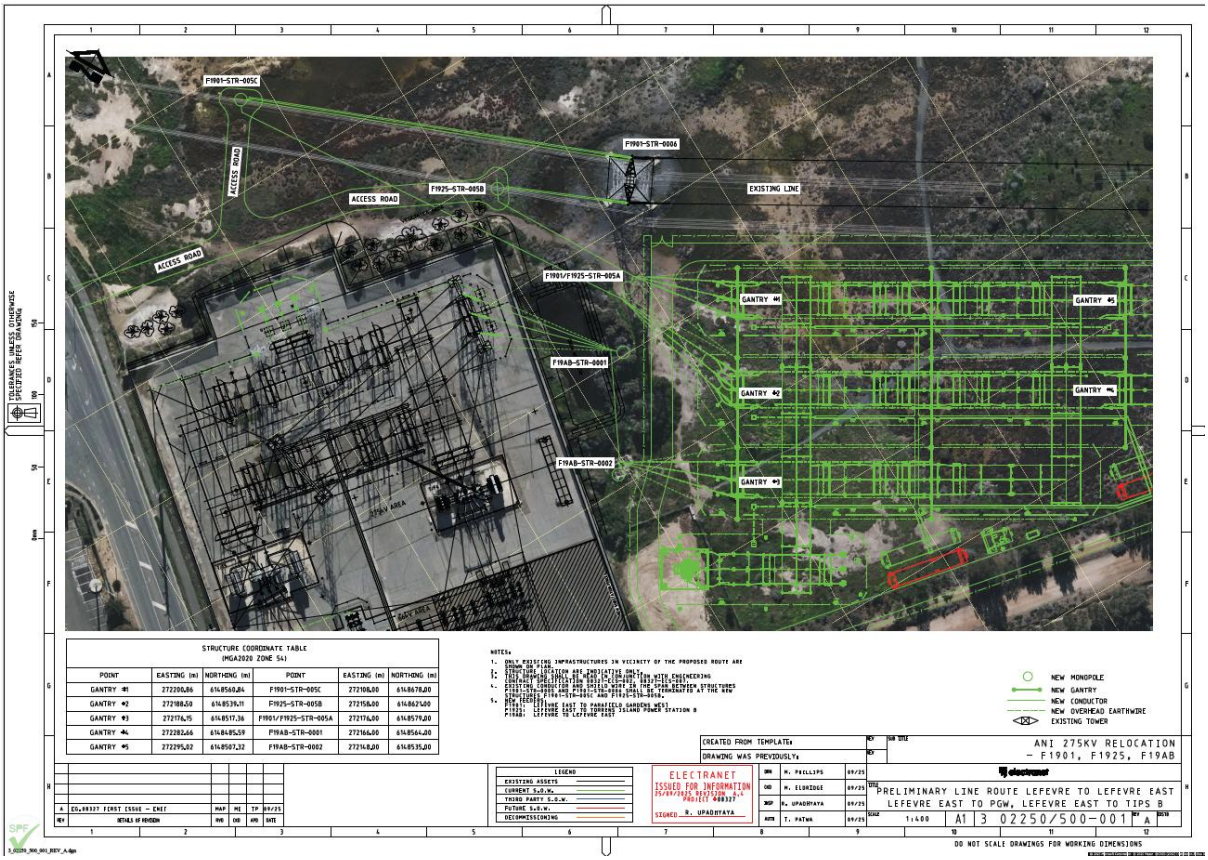




Lefevre and Lefevre East substations



Land Tenure including existing 50m transmission easement



Attachment 1C: Plans Lefevre East

Harm to Mutton Cove

These 4 diagrams show how extensive the impact on Mutton Cove will be with the new substation, the laydown area, access roads north of the existing substation and underground trenching.

While URPS Response to Council Comments and CPB Referral, pp8 and DHUD Report pp17 say “No new transmission corridor is proposed through Mutton Cove”, the project will involve considerable trenching in MC and access roads.

The 3 additional photos show the landscape north of the existing substation and what trenching and access roads will mean in trashing that area and operating in difficult circumstances, especially for electrical work.

As outlined on pp2 of my submission FPR has little faith in the processes outlined for managing trenching in this environment, given our tidal flows, including very high daytime tides in spring and summer. While there’s mention of “sand bags/silt socks/silt fences”, we’re advised more generally by Water Sensitive SA that these are not best practice for sediment control.



Figure 15: from tower by Lefevre substation looking west 6.8.2026 approx 2m tide



Figure 16 outside SW boundary looking east 9.10.26 approx 2.1m tide



Figure 17: outside SW boundary looking east 9.10.26 approx 2.1m tide

Revegetation

- In relation to Council concerns about revegetation of Mutton Cove, on pp8 of URPS's *Response to Council Comments and CPB Referral* states "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."

- It's important to us to understand who as 'the proponent' will be responsible for the rehab and reveg work for the lay down area and along the western boundary where the transmission towers are being removed and also the time frames for that work. Preference for ElectraNet.

Vegetation – trees

While Council, CP Board asked that the loss of trees be minimised, there's no obvious movement in that regard.

It's not clear if or how it will be ensured, as the URPS arborist suggests "that detailed design will consider all reasonable measures to avoid impacting regulated and significant trees where practicable" (pp26 DHUD report)

Nor where or when there will be any replacement trees, or if the Council and local community will be directly compensated for the loss of trees.