

## APPENDIX 1 - Consultation &amp; submission feedback and responses - Draft Environmental Sustainability Strategy

Stakeholder	Strategy Section	Feedback	Requested Change to Strategy
Veolia Environmental Services (meeting notes)	Intro/Profile/Framework	Generally supportive of wider strategy.	
	Goal areas - general	-	
	Goal 1 - Towards Net Zero	-	
	Goal 2 - Climate Resilience	-	
	Goal 3 - Waste & Resources	Supportive of working more closely with Council on waste & resources strategy aims to identify further actions. Supportive of better management of construction and demolition waste recycling. Suggested more frequent contractor meetings. Directed Council to new Green Industries SA Strategy in development.	
	Goal 4 - Water Sensitive	-	
	Goal 5 - Biodiversity	-	
Primary Industries & Resources SA (informal) (meeting notes)	Intro/Profile/Framework	Supportive of strategy and framework	
	Goal areas - general	Supportive of goal areas, in particular waste & resources and water quality/biodiversity	
	Goal 1 - Towards Net Zero	-	
	Goal 2 - Climate Resilience	-	
	Goal 3 - Waste & Resources	Supportive of goal area. Recommend engagement with further agencies re: organic and plastic waste, contacts to be supplied.	
	Goal 4 - Water Sensitive	-	
	Goal 5 - Biodiversity	Support working together on water quality monitoring. Currently being done by multiple agencies (PIRSA, SARDI, EPA, NRM, CSIRO, SA Water, Council, Aquaculture Sector), suggest investigate opportunity for streamlining through collaboration.	Update wording to reflect multiple stakeholders in water quality monitoring.

Eyre Peninsula Landscape Board (survey response)	Intro/Profile/Framework	General support for the strategy. Updates to "Community Profile" info: –Native Vegetation 845 hectares. Source EBS study 2010 – since 2010 there would be a fair amount of native vegetation clearance within the Council area. These figures may be available from the Native Vegetation Council (as area approved for native vegetation clearance). Would it be possible to adjust this 2010 figure to be more current. This may be important if these figures are to be used as a baseline to measure Council performance against goals. - 1°C change in average daily maximum temperature - we assume this is actually a 1°C "increase", and it would be better to describe it as such - 11 Increased intensity of extreme rainfall events - it is not obvious what the number "11" stands for in this context	Update climate change projection data regarding daily maximum temperature (1 degree C increase) and increased intensity of extreme rainfall events (11% increase).  Updated statistics for native vegetation requested from Native Vegetation Council.
	Goal areas - general	General support for the goals.	
	Goal 1 - Towards Net Zero	-	
	Goal 2 - Climate Resilience	-	
	Goal 3 - Waste & Resources	-	
	Goal 4 - Water Sensitive	-	
Goal 5 - Biodiversity	Suggest consider revegetation activities and coastal management, particularly relevant to Parnkalla and Heritage Trails.	Council notes typically a State Government role in management of coastal reserves, however elements of coastal management to be considered via action identified in Draft SDP 2025-2034 to "Develop Strategy to extend and improve the Parnkalla Trail"	
Eyre Peninsula Local Government Association (meeting notes)	Intro/Profile/Framework	Supportive of strategy and framework	
	Goal areas - general	Supportive of goal areas	
	Goal 1 - Towards Net Zero	-	
	Goal 2 - Climate Resilience	-	
	Goal 3 - Waste & Resources	Supportive of structuring COPL strategy in line with EPLGA strategy. Supportive of industry stewardship initiatives, will provide contact details. COPL is enabler of this discussion in most cases, and often also the service provider. - concerned public recycling bins won't work due to "tragedy of the commons", has been problematic elsewhere. Recommend review experience of other Councils, consider a) CDS bins (can and bottle) as first step, b) a "trial" on foreshore as second step, c) auditing foreshore bins to show the contents - suggest targeting zero CDS in waste stream - suggested targeting "zero nets to landfill", work with industry - suggest lobbying State Government for mobile collection of hazardous waste (eg. paint back scheme) - support education delivery in conjunction with community organisations & Which Bin branding. - no specific data system identified in EPLGA strategy, more around consistent data capture and management.	- Consideration to zero waste targets for specific waste streams will be given at the time of reviewing the Waste & Resources Management Strategy, with Council Administration noting the need to improve systems for data capture and reporting before setting innovation targets. - Rewording of action item to include lobbying for improved access to mobile collection of hazardous waste - Rewording of action item around "data management system" to reflect more broadly the need to improve data capture and reporting.
	Goal 4 - Water Sensitive	-	
Goal 5 - Biodiversity	-		

Australian Southern Bluefin Tuna Industry Association (meeting notes)	Intro/Profile/Framework	-	
	Goal areas - general	-	
	Goal 1 - Towards Net Zero	-	
	Goal 2 - Climate Resilience	-	
	Goal 3 - Waste & Resources	Supportive of goals. "Our sector will increasingly move to a stronger circular economy, both in recycling fish waste and our nets/ropes/cage rings etc. However, this is not cheap, nor are there obvious markets for this product. So, initiatives that bring Council, Green Industries SA and industry together can make a real difference." - Would like to see actions a bit stronger and more overt around industry (social licence and circular economy), stronger message. Suggested follow up opportunities for organics streams.	Considered under Waste & Resources Management Strategy.
Goal 4 - Water Sensitive	-		
Goal 5 - Biodiversity	-		
South Australian Sardine Industry Association (meeting notes)	Intro/Profile/Framework	Generally supportive of the strategy, goals and framework. The second half of the document (Action Plan tables) has too much cross referencing and abbreviations so is not accessible to the average reader.	Review Action Plan to simplify/remove cross referencing, table layout, and abbreviations. Water quality & WSUD action items to be covered under "Biodiversity" and duplication removed under "Water Sensitive"
	Goal areas - general	Generally supportive of the goals.	
	Goal 1 - Towards Net Zero	-	
	Goal 2 - Climate Resilience	-	
	Goal 3 - Waste & Resources	- Would like to find out specific data about waste from the industry, eg. ropes, nets, and other. Industry needs to establish standard operating procedures around end of life plastics recycling, eg. disassembly and separation prior to stockpiling for transfer. - Would like "Product Stewardship" defined	Covered under Waste & Resources Management Strategy. Include definition of product stewardship.
Goal 4 - Water Sensitive	-		
Goal 5 - Biodiversity	Supported coordination of water quality monitoring between agencies and industries.	Rewording around water quality monitoring to reflect collaboration opportunities	
Spencer Gulf & West Coast Prawn Association (meeting notes)	Intro/Profile/Framework	Generally supportive of the strategy, noting their own strategy recently published.	
	Goal areas - general	Generally supportive of the goals.	
	Goal 1 - Towards Net Zero	-	
	Goal 2 - Climate Resilience	-	
	Goal 3 - Waste & Resources	Supportive of Council working with industry around waste stewardship. Prawn Association involvement in new pilot project to recycle fishing nets.	
Goal 4 - Water Sensitive	-		
Goal 5 - Biodiversity	Supported coordination of water quality monitoring between agencies and industries.	Rewording around water quality monitoring to reflect collaboration opportunities	

Community Members (survey answers)	Intro/Profile/Framework	See survey responses. Typically strong support for strategy and goals, noting one negative survey response.	
	Goal areas - general	Support for goal areas. Suggestions made about possible actions and initiatives.	
	Goal 1 - Towards Net Zero	<ul style="list-style-type: none"> <li>- Support for improving efficiency of housing and building stock.</li> <li>- One negative response challenging necessity to manage carbon emissions, climate change projections and associated risks.</li> </ul>	
	Goal 2 - Climate Resilience	<ul style="list-style-type: none"> <li>- Support for improving efficiency of housing and building stock.</li> <li>- Consider review of mechanism for a significant (shade?) tree register</li> </ul>	Add to Strategy that Council will "Consider possible mechanism to recognise large trees on land under Council's care and control through Council Policies and existing Action Item relating to tree canopy mapping"
	Goal 3 - Waste & Resources		
	Goal 4 - Water Sensitive	<ul style="list-style-type: none"> <li>- Support for minimising drinking water use for irrigation, and other water saving measures.</li> <li>- Support for planning policy to increase requirement for rainwater tank installation</li> </ul>	Revise wording to reflect stormwater overlay review in 2025 Planning Code Masterplanning project
	Goal 5 - Biodiversity	<ul style="list-style-type: none"> <li>- Support for water quality monitoring and managing impacts on biodiversity.</li> <li>- support for increasing native plantings on foreshore and walking trails to improve biodiversity and incorporate in cityscape</li> <li>- support for a significant tree register, specifically for "Shade trees" as a form of climate change resilience rather than neighbourhood character. Examples of recent large shade trees removed without obvious reasons.</li> <li>- support for appropriate plantings that encourage biodiversity &amp; support threatened species</li> <li>- support to update native vegetation study (2010 is too old). Include clarity of species, canopy, cover and height.</li> <li>- support for construction of wetlands to support biodiversity &amp; stormwater management.</li> </ul>	<ul style="list-style-type: none"> <li>- Updated information on native vegetation information requested</li> <li>- Add to Strategy that Council will "Consider possible mechanism to recognise large trees on land under Council's care and control through Council Policies and existing Action Item relating to tree canopy mapping"</li> </ul>
Written Submission	Intro/Profile/Framework	<ul style="list-style-type: none"> <li>- Support for development of the strategy, noting preference for future wider scope to include a whole-community action plan with a 'community voice' advisory group.</li> <li>- noted monitoring and evaluation is not mentioned in strategy</li> <li>- noted importance of planning system, land use and land zoning, and that Eyre Peninsula Regional Assessment Panel and Planning and Design Code have not been referenced in the strategy</li> <li>- request to acknowledge role of planning system in environmental outcomes</li> <li>- request for annual review of strategy</li> <li>- request to align development approvals with Council's strategic objectives</li> <li>- print version requested in plain black and white to reduce environmental impacts and costs of printing.</li> </ul>	<ul style="list-style-type: none"> <li>- provide black and white printable version of strategy with reduced graphics</li> <li>- Council strategies are not reviewed on an annual basis due to resourcing limitations, other than where significant changes in legislation or Council strategic objectives.</li> <li>- Council's objective for this version of the Strategy is to focus on assets under Council's care and control, whilst noting the role of urban planning and development in environmental sustainability outcomes</li> <li>- monitoring and evaluation of sustainability performance is addressed within the core action plans of specific goal areas, eg. Waste &amp; Resource Management Strategy, Towards Net Zero emission reporting and management framework, Stormwater Management Plan.</li> <li>- Clarify intention for reporting of performance in each area to be included in Council's Annual Report process.</li> </ul>

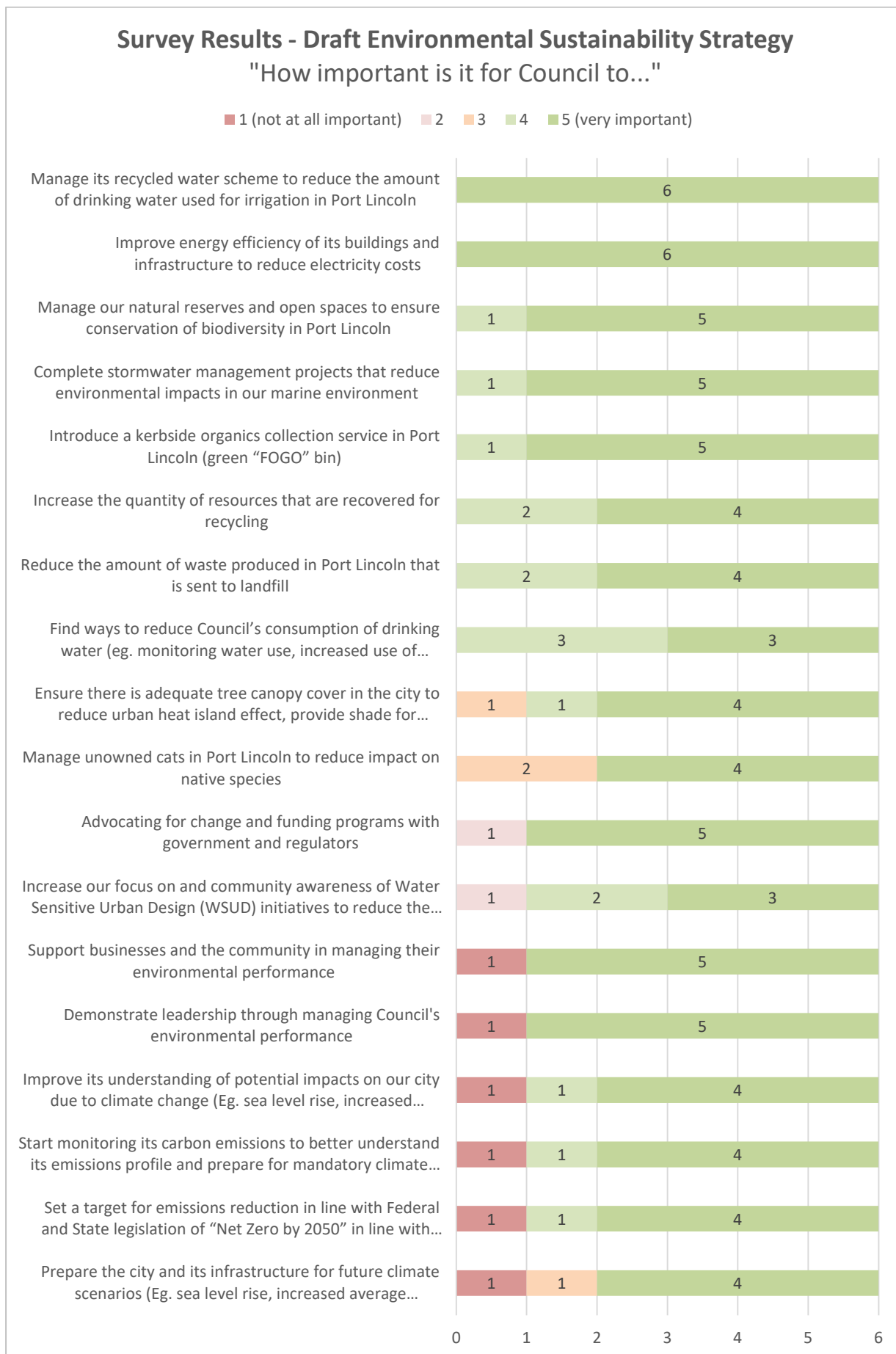
Goal areas - general	Consider a new GOAL that “Shift towards a more circular economy”	Goal 3 - Waste & Resources and associated Action Plan in this strategy, supported by Council's Waste & Resources Management Strategy 2025-2029 sufficiently addresses Council's position on promoting principles of a local circular economy.
Goal 1 - Towards Net Zero		
Goal 2 - Climate Resilience	<ul style="list-style-type: none"> <li>- Consider GOAL 2 is also about “creating sustainable and resilient communities”.</li> <li>- Design better sustainability systems for existing and new residential developments</li> <li>- Design for the impacts of wildfire events (pre- and post), particularly on properties on the perimeter of Port Lincoln</li> <li>- Re-cover (i.e. revegetate) forgotten spaces - there are many of these and it's not just about street trees</li> <li>- Elevate community responsiveness and adaptation to climate change</li> <li>- Facilitate preparedness planning for natural disasters and extreme weather events (e.g. implement systems to counter the impacts of sustained heat waves)</li> </ul>	- Climate change risk assessment and adaptation planning action items adequately address points raised within defined scope of Strategy. Opportunities for more advanced measures to be considered during initial phases.
Goal 3 - Waste & Resources	<ul style="list-style-type: none"> <li>- Adjust Council's services and operations towards a more circular economy</li> <li>- undertake a community-wide study into how Council can be involved in a circular economy</li> <li>- develop a Circular Economy Plan</li> <li>- shift Council's procurement policy to support a circular economy paradigm including recycled content</li> <li>- support community understandings and undertakings in a circular economy</li> </ul>	<p>Goal 3 - Waste &amp; Resources and associated Action Plan in this strategy, supported by Council's Waste &amp; Resources Management Strategy 2025-2029 sufficiently addresses this item.</p> <p>- Council's existing Procurement Policy 7.63.15 adopted September 2024 includes consideration of environmental sustainability at Objective 6 on p 6.</p>
Goal 4 - Water Sensitive	<ul style="list-style-type: none"> <li>- investigate potential to sequester land in railway yards for wetlands/detention basins servicing Kirton Point and LeBrun Street catchments</li> <li>- request for SMP to consider WSUD initiatives associated with Mallee Park basin</li> <li>- request for rainwater harvesting to be further incorporated as a WSUD measure to mitigate flood peaks.</li> </ul>	<ul style="list-style-type: none"> <li>- opportunities associated with closure of the rail line have been raised with Department of Infrastructure and Transport (DIT) in previous years, noting ongoing discussion with DIT and Viterro around reopening of rail line.</li> <li>- opportunity to use rail yard land for stormwater detention near LeBrun Street pump station is currently being considered by Council Administration along with a range of other options as part of ongoing work associated with implementation of Council's Stormwater Management Plan, and is included as an agenda item in upcoming discussions with DIT.</li> <li>- consideration of WSUD initiatives for Mallee Park basin including construction of wetlands have been included in the Stormwater Management Plan with \$1M funding allocated in Council's long term financial plan, as indicated in the Action Plan contained in this strategy.</li> <li>- include reference in Strategy to review of stormwater overlay in Council's Planning Code Review project</li> </ul>

Goal 5 - Biodiversity

- request for privately owned land at Murray's Point to be acquired for conservation of largest remnant coastal bushland
- build a better understanding of Council's environmental assets
- investigate and value the existing remnant but disconnected mallee ecosystems in the urban framework
- conduct a significant tree/native vegetation audit
- establish a Significant Tree Preservation Register and policy
- provide proactive mechanisms to protect remnant environmental assets
- support community groups who seek to help in areas such as Murray Point

- Add to Strategy that Council will "Consider possible mechanism to recognise large trees on land under Council's care and control through Council Policies and existing Action Item relating to tree canopy mapping"
- Consider opportunities for community participation (citizen science, tree planting program)
- acquisition of private land for conservation of biodiversity is not currently a strategic priority of Council due to budget constraints. Council Administration notes that majority of land at Murray's Point is under Council's care and control, and identifies Murray's Point Masterplan project and Planning Code Review projects will both consider aspects of biodiversity in final recommendations.

**APPENDIX 2. Your Say Survey Responses**



**APPENDIX 2. Your Say Survey Responses**

Respondent	1. Do you have any additional feedback on Council's environmental sustainability goals?	2. Do you have any additional feedback on Council's environmental sustainability 10 year action plan?	3. Is there anything missing from Council's draft strategy that you would like to see included?
Eyre Peninsula Landscape Board	The goals are very appropriate. Council might like to consider revegetation activities and coastal management in their Biodiversity Conservation goal. This is particularly relevant for Council reserves and the Parnkalla and Heritage Trails.	<p>Page 2 (Community Profile):</p> <p>-Native Vegetation 845 hectares. Source EBS study 2010 – since 2010 there would be a fair amount of native vegetation clearance within the Council area. These figures may be available from the Native Vegetation Council (as area approved for native vegetation clearance). Would it be possible to adjust this 2010 figure to be more current. This may be important if these figures are to be used as a baseline to measure Council performance against goals.</p> <p>- 1°C change in average daily maximum temperature - we assume this is actually a 1°C "increase", and it would be better to describe it as such</p> <p>- 11 Increased intensity of extreme rainfall events - it is not obvious what the number "11" stands for in this context</p>	
User	The goals are very appropriate.	<p>Page 4 (Community Profile):</p> <p>* 1 Degree C change in average daily maximum temperature - I assume this is actually a 1 degree "increase", and it would be better to describe it as such</p> <p>* Increased intensity of extreme rainfall events - it is not obvious what the number "11" means in this context</p>	Looks good!
User	<p>Housing energy efficiencies are to be improved across existing as well for any new built.</p> <p>Rainwater run-off collection areas; are they an option?</p> <p>Crazy to flush 'drinking quality water' literally down toilets. Install 'non-recycled water' piping that is not connected to toilets, (kitchen), showers, bath, wash basin, laundry, and garden taps.</p>	Built large (also U/G) drinking water tanks, strategically (far away from PRIME residential land locations), to guarantee and serve Port Lincoln's (etc.) drinking water needs in future. That to be stored quality drinking water could hopefully (in future) be pumped from Adelaide, desalination plant and or other regions.	Establish ways, educate, and organize all agriculture industries to end (fertilizer) poisons from being utilized any longer, as well needlessly, posing health & fire risks to Port Lincoln residents, and from poisons flowing into the Todd dam. (street) Rainwater run-off that also feed water dams can then be utilized as quality water storage. Clean up the Todd (etc.) water Dam from the agriculture taxes now expended in 'far too costly' Adelaide.
User	<p>We need CO2 for things to grow why would we want to reduce our carbon footprint if we need carbon dioxide for a green canopy over Port lincoln the amount of CO2 australia put out is miniscule it's just a scam to make us pay for projects that will not make any difference same as the climate change Yes the climate does change but there is nothing that human species can do to stop it it involves over millions of years the sea has not rose on Port Lincoln for the last sixty odd years that I can recall. Stick to upgrading our roads and foothpaths and Storm water .</p> <p>We don't want this as it's costs we the rate payer has to shoulder with rates going up this year we can't afford this.</p>		



I really welcome Council's initiative to develop an Environmental Sustainability Strategy, and agree with the broad areas.

Personally it gives me great joy to see Councils' use of local native plants to beautify areas like the wharf. When the pig face is in flower the vista is stunning. I also like the fact that gum trees have been planted to create shade and an aesthetic screen; and these will become a great wind shelter once they've become fully established.

The new play space near the town jetty is another very welcome addition to Port Lincoln, the design and use of native plants creates a peaceful ambience. I was a little disappointed that a representation of the fishing industry was not incorporated (eg re-cladding the previous foreshore playground vessel wheelhouse with wood to give it a facelift). The addition of a miniature fishing vessel or wheelhouse/crows nest might be an idea for a later expansion - the Kalbarri WA play space incorporates a crows' nest/pirate ship design as a climbing structure which also acts as a launch area for a short zip-line into the sand pit.

REGISTER AND RETAIN all remaining large and/or existing effective shade trees MUST become an extremely high priority for 'Climate Adaptation'. Trees take time to grow to become useful shade - the continued destruction and removal of shade trees is extremely disappointing.

Some recent examples include REMOVAL OF

- Eucalypts in front of the Beer Garden, these were a food source for musk lorikeets and nice shade to park under (replacing with jacarandas are effectively useless as habitat for local birds)
- the lovely established shade tree at the wharf end of the foreshore beach, the mosaics in the paving are a nice touch but it is no longer possible to sit and appreciate these because it is too hot in the direct sun!
- eucalypts in the marina, leisure centre carpark - these were great shade and wind shelter in a dusty hot area and also provided shelter for Nankeen night herons and food for musk lorikeets. These were replaced with useless ficus's which only provide food for over-abundant species like sea gulls which create nuisance and defecate on roof's and infrastructure
- the Eucalyptus sideroxylon (and others) from the round-about area between Coles, Westpac, Bayroom and Woollies - this was critical shelter and food for the musk lorikeet as well as shade for pedestrians and cars.
- large gum at O'Connor reserve (perfectly healthy established tree cut down because teenagers swung on a branch causing it to break off).

Musk Lorikeets are now EXTINCT in Pt Lincoln City

As priority:

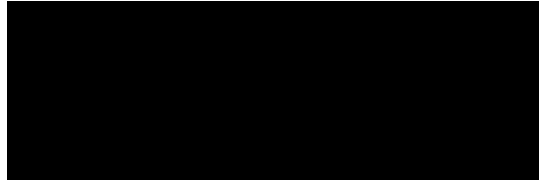
- Update Native vegetation report (2010 is OLD). Include clarity of species, canopy cover & height.
- Establish tree register to retain and promote the health of ALL remaining trees, STOP poisoning, compacting & paving root zones
- In wider LGA area discussion/promote concept of conveyor to deliver grain to Port Lincoln silos/wharf. This could follow existing rail corridor and use multiple solar/wind/battery points along the length for renewable and sustained power.
- Water security introduce a requirement of eg 10,000L rainwater tank for every bedroom (tanks reduce runoff into storm water system and reduce pressure on underground basins). Promote use of water saving devices like composting toilets.
- For biodiversity, climate adaptation, storm water management, water security
- Establish wetlands at every possible location, and at each stormwater outlet along foreshore beach - small wetlands filter polluted run-off, protecting sea-grass; slow the flow, reducing erosional energy and creating foraging and resting areas for local shorebirds (osprey, oystercatchers). Establish shellfish reefs at each to give additional benefit of slowing coastal erosion, removing nutrient which currently promotes razorfish, and provide habitat/nurseries for fish. The disused rail corridor also offers opportunity for stormwater/wetland system with a functional conveyor for delivering grain to wharf/silos.
- Retain & improve Greyhound road/Murray Point environmental values

User

## CITY OF PORT LINCOLN

## DRAFT ENVIRONMENTAL SUSTAINABILITY STRATEGY 2025-2034

## COMMENTS



26 September 2024

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**Introduction**

Council is commended for the significant advancements compared with previous years, in environmental sustainability as presented in the Draft Strategy. There is much to do and substantial catching up.

Comments have already been submitted on one of the Environmental Sustainability Strategy's (ESS) Goals - the Draft Waste and Resources Strategy. This commentary focuses on the remaining four components - Towards Net Zero, Climate Resilience, Water Sensitive, and Biodiversity.

But first, Sustainability lesson no. 1 ... use less ink! I suggest that a plain text version of the graphics-heavy ESS be available to the public should anyone wish to print the document without consuming coloured ink. Whilst the document as presented might be assumed for screen viewing of whatever size - desktop to mobile - in general it is recognised that better critical analysis is undertaken from reading a printed copy just like reading a book, thus improving cognitive outcomes.

Likewise, it is noted that many of Council's other strategy documents are heavy on graphics and colour, and sometimes I wonder whether they get in the way of the content.

The following observations are in no particular order but are presented as a contribution of commitment to change, for that is what is needed across the local region.

**Observations**

1. The 10-year Action Plan is succinct and credit must go to Council and its officers for preparing the overall strategy. My initial impression is that it appears the ESS has been prepared for Council's own purposes, as illustrated by the allocation of "Strategy Items" to Council "Teams".

I wish to stress again that without a strong community voice the ESS is at risk of becoming just another internally produced plan that the community has little interest in. Council would know how difficult it would be to capture a range of voices, even dissenting ones that challenge the script.

I accept the current version of the ESS is a starting point, however the missing link in the environmental chain and one that will need to be inserted as soon as possible, is a community voice. I also accept that a community voice of sorts was involved to provide comment and feedback at the initial post-preparation phase but this was a brief facilitated workshop on a plan that had already been produced.

In the future, I recommend establishing an **Environmental Voice Advisory Group** that would ultimately provide greater community acceptance of, and strength to, the ESS.

2. **Monitoring and Evaluation** is not mentioned in the ESS but will be critical to how well the Strategy is progressing, and whether Goals are being satisfied or whether they require acceleration. Gaps can also be more easily identified.

Two simple methodologies that can be used within Council and at the community level are SWOT and Foresighting. The latter in particular allows people to think in alternative ways about the future, to help form a shared understanding of the local systems and their future, and to make better-informed decisions. Climate Change is one such area that the community should be more engaged with.

Note - Foresighting and how to apply it is one of the themes that would be introduced at the proposed Environment Centre.

3. Port Lincoln has significant advantages because of its remote position. It should be easier to collect and analyse data from across the whole local economy, but the ESS appears to be focused on just Council's own activities. The Strategy could be a whole-community action plan, and this includes businesses, sports entities, schools, and the health services sector.

4. **Boundaries.** Environmental sustainability does not recognise borders or boundaries, therefore partnerships and collaborations are expected to be forged to achieve planned environmental outcomes. No organisation can operate in isolation from its neighbour or compatriot or competitor. We are all in this together.

For example, other organisations that should be important collaborators are Landscape Board (EP), DC LEP, DEW, EPLGA, and importantly but not acknowledged is EPRAP.

With respect to DCLEP, it is an anachronism that CoPL would have a working ESS but its adjoining neighbour does not. Conceivably up to 2000 (maybe more) of that Council's citizens choose Port Lincoln as its community of interest, and they will all have some impact in one way or another on the environmental sustainability of Port Lincoln. This important matter has not been countenanced in the ESS.

5. **Planning.** The planning system is a critical element in achieving the Goals of the Strategy, but it seems not to have been considered. Every link in the environmental chain, and as presented in the 10 Year Action Plan, is connected to **land use**. It is inescapable. If behavioural change is the ultimate destination, then we all must think about our impacts on the land we occupy and the impacts on the wider world. Here is an example.

Planning, land use, the environment, biodiversity, the local community, and the local economy all became casualties when the proposed Whalers Way Orbital Launch Complex was first announced in 2018. These casualties continue to this day. Governments and the proponent demonstrably failed to uphold environmental values. And EPRAP also failed in its duty of care. They are all impacting on the psychology of concerned citizens who have taken on the role of environmental protectionists, because governments (and local governments) have failed to uphold their duties and responsibilities.

Thus, the ESS could be at grave risk of not achieving its goals because of the impacts of external decisions and influences, and the effects of unthinking developers, on the minds of citizens. If governments don't care,

why should they? That is the risk.

Remember, environmental sustainability does not recognise borders, and we would be fooling ourselves if we thought that there would be no impact from activities outside Council's boundaries.

It is notable that the ESS (pg. 5) excludes the Planning and Design Code as a "supporting" document. There are serious flaws in the planning system in SA, contrary to the views of the Planning Minister, and they are no more evident than the irrational location at Billy Lights Point of the proposed desalination plant. Council voiced its objection, but it was not on the basis of environmental protection and the rules in the Planning and Design Code.

This location compromises not just the Planning and Design Code but it will also have a serious impact on the ability for the ESS to vindicate protections at Murray Point.

A further matter that has not been countenanced in the ESS is related to land use zonings. Sure, there is a line in Biodiversity that mentions "Murray Point Masterplanning", but does this just relate to the parcel owned by the people i.e. Council? Clearly, the zones - General Neighbourhood, Deferred Urban, and Strategic Employment - in the whole Murray Point locality are inappropriate, and should be changed as a matter of priority. This land should also be acquired for purposes of conservation of the largest remnant of coastal bushland, and which is disconnected from other bushland areas, in Port Lincoln. The benefits would be enormous.

Thus, planning is a critical component in all facets of the Strategy, and should be acknowledged accordingly.

## 6. Further considerations

Consider GOAL 2 is also about "creating sustainable and resilient communities".

- Design better sustainability systems for existing and new residential developments
- Design for the impacts of wildfire events (pre- and post), particularly on properties on the perimeter of Port Lincoln
- Re-cover (i.e. revegetate) forgotten spaces - there are many of these and it's not just about street trees
- Elevate community responsiveness and adaptation to climate change
- Facilitate preparedness planning for natural disasters and extreme weather events (e.g. implement systems to counter the impacts of sustained heat waves)

Consider also;

- build a better understanding of Council's environmental assets
- investigate and value the existing remnant but disconnected mallee ecosystems in the urban framework
- align development approvals with Council's strategic objectives
- conduct a significant tree/native vegetation audit
- establish a Significant Tree Preservation Register and policy
- provide proactive mechanisms to protect remnant environmental assets
- support community groups who seek to help in areas such as Murray Point

Consider a new GOAL that "Shift towards a more circular economy"

Adjust Council's services and operations towards a more circular economy

- undertake a community-wide study into how Council can be involved in a circular economy
- develop a Circular Economy Plan

- shift Council's procurement policy to support a circular economy paradigm including recycled content
- support community understandings and undertakings in a circular economy

7. **Water Sensitive Action.** Port Lincoln's greatest under-utilised land asset is the railway yard that extends from London St. bridge to LeBrun Street. Should rail movements resume in the future, it is most likely they will be curtailed, thus resulting in substantial idle space in the rail yard. As a civil engineer who has designed many urban drainage systems in the past, including constructed wetlands, I urge Council to investigate the potential to sequester land in the railway yards for a series of constructed wetlands to capture urban runoff from the Kirton Point catchment and the LeBrun Street receival area. Council has apparently adopted the "Updated Revision" 2019 version of the SWP, but I believe there are critical gaps in the Plan. Here is one.

In terms of the LeBrun Street area, to my mind it is unsatisfactory for properties in that locality to be subjected to higher risks of storm flooding when an alternative solution is available.

The Strategy refers to the Council's Stormwater Management Plan, and the associated Program contains two entries for the LeBrun Street system. The SWP has not considered other approaches to stormwater management. If no investigation has been undertaken of the potential to sequester land in the railway property, then two options for consideration in the ESS are;

- A. a flood retention basin/constructed wetland at the corner of Porter Street and LeBrun Street at the Mortlock Street roundabout
- B. a flood retention basin/constructed wetland along the eastern side of the main rail line and north of the LeBrun Street crossing; this might mean a reconfiguration of the alignment of the main rail line.

As a former railway engineer, I have noted that most of the shunting yards appear to be redundant, and there is scope to reconfigure the rail yard layout to accommodate essential rail movements, but to optimise the land use accordingly. It may be that the yards will not be needed again.

Following the closure of the rail network in 2019, I offered to Council representatives on three separate occasions an environmentally sustainable solution for stormwater drainage to relieve the inflow to the existing pumping system that is prone to significantly higher risk in times of severe storm events. If a call to Aurizon (the lessee of the rail yard property) and the state government (the owner) has not been made to ask the simple question about the potential availability of land for an essential service (stormwater management) then I suggest it is time.

The pump system is a typical engineering solution with little regard for the pollution of Boston Bay.

Another significant matter is the Mallee Park basin and locality. The SWP described some aspects but offered little else. The significant disjunction between infrastructure availability (i.e. Mallee Park storage) and development is no more apparent than the current shed developments in Seaton Avenue that collectively discharge a large volume of roof runoff to the drain system that ultimately discharges to the basin at Mallee Park.

If WSUD was applied to this precinct then a significant portion of roof runoff could have been captured, stored, and re-used. But it has not happened. It is a failure of policy and the planning system.

The SWP mentions Education and Awareness (SWP pg. 51) but I am not aware that this is undertaken by Council.

WSUD is also about on-site storage - rainwater tanks - but again the SWP (pg. 53) is outdated, however it is correct to say that rainwater tanks can have a substantial effect on attenuating flood peaks up to the 5 yr AEP (Annual Exceedance Probability as it is now referred to). Thus, the ESS could add further detail about on-site storage actions supported by an audit of the current storage capacity throughout Port Lincoln.

Other strategies exist in WSUD, but I will leave my comments at that for now.

**Conclusion**

The ESS is a good start in Port Lincoln’s transition to a more sustainable future, but there are potential headwinds. If the ESS is to be successful it must be kept alive, to be annually reviewed, to be self-critical, and to be more than just an action plan for Council itself.

Council is just one spoke, albeit a significant one, in Port Lincoln’s urban life. All the other spokes must be inserted into the wheel, and this includes the community. An empowered community with a voice will be critical to the success of the ESS.

It is not expected that Council will have all the answers, but it is expected that the community be a vital part in the transition to true environmental sustainability.

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