# To:

The City Council of Port Lincoln

From:



**Date: 29 May 2025** 

**Dear Councillors and Staff** 

Re: Submission regarding the City Council proposal to revoke public land reserves.

Public reserves are required as a condition of subdivision approvals. At first it seems ridiculous as there is so much surrounding open space but as the subdivided land is built upon, there is more need for the public open space. I have no doubt that this will become the case at each of the reserves proposed for revocation and sale.

It is much more appropriate to increase housing density and make better use of public reserves than to subdivide into sprawling suburbs. We cannot continue to clear native vegetation and overtake farmland indefinitely. Not only is it environmentally destructive, but it also greatly increases the cost of public infrastructure to service these properties, whilst limiting the number of rate payers who pay for that infrastructure.

A 600 square metre block costs approximately 20 percent more to service with roads, stormwater and footpaths (and to a lesser extent, waste management), than a 400 square metre block.

It makes no sense that the owner of a small unit in the town centre, pays similar rates to someone on the outskirts with a one hectare block. Council's cost to service the larger block will be about ten times greater but Council rates will be similar.

Yes, we already have excessively large blocks but in future, there will be more of these large blocks and the cost of supplying Council (and power, water, sewer, highway etc.) services to them will not change our current problem unless we start that change now. A rating matrix which includes a price per area would be much more equitable and reduce the percentage of Council costs per ratepayer, spent on public park reserves.

The price of land or the price of infrastructure built on it, bares little relevance to the cost of supplying Council infrastructure. Council service costs partially relate to the number of people and mostly to the space they live on. Council must market this idea to politicians to allow them to solve the current service cost crisis.

If public reserves are sold now, when Council eventually decides to restrict the size of blocks through rates and/or planning regulations, the cost to buy back reserve land to service the higher population density, will be astronomical.

A large proportion of the space on most housing blocks is excess to requirements. It contributes to public health, weed and fire problems and contributes to unsightly, overgrown and junk filled landscapes.

Larger allotments cost a greater amount of landholder's discretionary spending on property maintenance than small blocks. This spending would be much more appropriate on environmental or community services than on private 'shrines' to 'more is better thinking'. It is much more environmentally, socially, and economically responsible to improve the number and amenity of public reserves and reduce allotment size, than to sell off public reserves and allow larger allotment sizes, which greatly increases Council infrastructure maintenance costs.

The <u>time</u> to limit the ongoing cost of building and maintaining public infrastructure such as roads and stormwater, is now.

It would be far more sensible to charge rates on the area of the allotment than on the sale price of land or infrastructure on it. This would encourage people to have smaller allotments and most people would save time and money on land maintenance and they would make better use of public park reserves. Yes, the cost of running public parks would increase but this would be a much smaller percentage of Council's infrastructure and maintenance costs.

The establishment of public parks at the time of subdivision was the work of forward thinking people. Selling them to save money is illogical and counterproductive thinking.

Please <u>fix the cause</u> of the funding problem, don't exacerbate the problem with short term thinking. The problem is not the cost of maintenance of reserves. The problem is the cost of supplying infrastructure to ridiculously large allotments. We will not easily educate people to have smaller gardens/house-yards because we have become accustomed to space being a status symbol. Payment of proportionate extra Council rates and the tax on the transfer of larger allotments, would be a much more appropriate method of restricting property allotment size. This however comes with a proviso. It must be accompanied by regulation that assists well planned increase in housing density by those who currently own larger allotments.

# Kind regards Ratepayer,

# Considerations for the revocation of Community Land in Port Lincoln

10 year Strategic Directions Planning may look like long-term thinking. However, it is not truly future proofing our city if the focus is on development and dollars, and not the entire city ecosystem any further than the next few decades.

We have the option to go up or out and we have seen countless councils and developers land grabbing whatever is convenient and destroying parks, reserves, community land, productive agricultural land, and native vegetation without real thought for the future needs of the whole community.

Many cities worldwide including New York, Paris, Hong Kong, and Tokyo are implementing strategies to balance urban growth with livability and sustainability. They are designing multi-use, high density living, repurposing older buildings, and constructing vertical communities with access to multiple green spaces within a close radius to ensure residents have access to the scientifically proven benefits of nature.

This is not a new trend or something the 'Greenies' thought up, Colonel William Light designed Adelaide with grid-like structure, including wide streets, terraces, and public squares, all surrounded by parklands in 1837.

# 1. As a bushfire prone area, the fire mitigation benefits of Port Lincoln community land should be taken into consideration:

Parks and reserves create safe buffer zones in urban areas.

Emergency access routes for firefighting, and escape routes for residents.

Slow burning native vegetation and grassy areas act as fire breaks, slowing the fire front to allow residents time to evacuate and giving firefighters a higher chance of controlling the fire before it gets into compact residential areas causing the loss of property and often the loss of human life.

#### 2. Reduced Urban Heat Island Effect:

Vegetation provides shade and cools the air through evapotranspiration, helping to mitigate higher temperatures generated off roads and buildings.

#### 3. Health Benefits:

Spending time in nature has been proven to lower cortisol, reduce stress and anxiety, and improve overall well-being. Cities with more greenery have lower heat-related health risks and are less reliant on the healthcare systems for mental and physical care.

# 4. Noise Reduction:

Trees and other vegetation can absorb and redirect noise, helping to reduce noise pollution in urban areas.

#### 5. Flood Mitigation:

Green spaces, particularly wetlands and riparian areas, help to slow down and absorb stormwater runoff, reducing the risk of flooding. Green spaces also filter pollutants and microplastics from stormwater before they can be washed into the bay.

#### 6. Crime:

Well-designed green areas are linked to lower crime rates through increased visibility, public activity, and surveillance by park users.

#### 7. Social Cohesion:

Green spaces can create community gathering places, foster social interaction and community groups, creating a shared neighbourhood identity.

#### 8. Physical Recreation:

Regular use of green spaces is linked to lower obesity and reduced cardiovascular disease rates. Opportunities for physical exercise improve overall long-term health and wellbeing which lowers the reliance on our aged care systems.

#### 9. Improved Air Quality:

Green spaces act as natural filters, absorbing pollutants like carbon dioxide, nitrogen dioxide, sulfur dioxide, and particulate matter, leading to cleaner city air.

#### 10. Enhanced Biodiversity:

Green spaces provide ecological corridors and habitats for plants and animals, supporting biodiversity and contributing to the health of the urban ecosystem. They preserve endangered plants, birds, animals, reptiles, and insects and provide places for children to learn.

# 11. Economic and Urban Performance of Green Spaces

Properties near green spaces have higher market values. Studies show increases of 5–20% in value.

Green, livable cities attract skilled workers, investors, business and tourism through enhanced city branding and global reputation.

Reduced health care costs due to improved public health.

Lower energy costs thanks to natural cooling and shading.

# I strongly OBJECT to the proposal for the Revocation of All Community Land and more specifically the 25 Chapman Street Reserve.

The public meeting held on site on May 10 was an eye opener. The Council representative appeared unable to answer many of the questions raised which was very surprising. He was not even aware that lands surrounding the reserve had three different zonings and that there were different minimum site areas for subdivision purposes. When asked about minimum site areas for the reserve if subdivided he couldn't give a definitive answer. He was asked about services to the reserve and specifically sewer....his response. I don't know that would be up to the developer to ascertain. From the outset it appeared his view was that the reserve was not used, cost money to maintain and was just too much bother. It appears that that the pursuit of Council is one of financial gain despite saying the opposite.

# **According to Council**

#### **Current Use**

25 Chapman Street is currently underutilised and has no community function. The land is undeveloped and contains no notable features of public interest. The Council is regularly required to conduct fire prevention and pest control works at the site, which come at a cost.

# How the Council Proposes to Use the Proceeds of Sale

If sold, the proceeds of sale would be included in the Land and Building Reserve for reinvestment into community assets and infrastructure, as approved by the Council.

This reserve may appear to be under utilised by council however it is used daily by local residents even if just for exercise and walking dogs. It used to used more often until council stopped maintaining a fire break which ran through the middle of the reserve.

When I purchased my property I made enquiries as to the Reserve and any proposed Council Plans and was told in no uncertain terms that it was a Reserve and would stay that way and not be developed. Obviously Council is not to be trusted.

An aerial overview of the area for those that do not know it clearly shows that this Reserve forms part of a native vegetation and wildlife corridor that runs from

Walter Street down the hill through the subject property and down through the RuN zoned acre block area via additional Council land to the Oasis. This corridor also encompasses a natural waterway including a dam on the property immediately west of the reserve. The Reserve is a major part of the catchment that contributes to this waterway that has already been impacted over the years by council sealing local roads and diverting storm water. The native flora and fauna will be severely impacted by any development. The Native Vegetation Council in a report of the area noted that Acacia Anceps while not endangered is becoming scarce in Port Lincoln due to increasing development and land clearing. This flora species is very predominant throughout this reserve.

# **Current Zoning is Rural Neighbourhood: RuN**

# **Desired Outcome:**

"Housing on large allotments in a spacious rural setting, often together with large outbuildings. Easy access and parking for cars. Considerable space for trees and other vegetation around buildings, as well as on-site wastewater treatment where necessary. Limited goods, services and facilities that enhance rather than compromise rural residential amenity."

# **Limited Land Division:**

"The long term use of land for primary production is maintained by minimising fragmentation through division of land

- Land division does not result in the creation of an additional allotment
- No additional allotments are created"

# **Native Vegetation**

"Areas of native vegetation are protected, retained and restored in order to sustain biodiversity, threatened species and vegetation communities, fauna habitat, ecosystem services, carbon storage and amenity values."

#### **Water Resources**

"Protection of the quality of surface waters considering adverse water quality impacts associated with projected reductions in rainfall and warmer air temperatures as a result of climate change.

Maintain the conveyance function and natural flow paths of watercourses to assist in the management of flood waters and stormwater runoff."

Given the current Zoning restrictions and constraints this area does not sound like suitable prospect for a Housing Development.

Council appear to be pushing the point that Port Lincoln needs additional land for subdivision ergo housing. Port Lincoln has such areas in private ownership but to date development has not been undertaken. This includes a development to the north of this reserve that had approval but did not proceed. There are large areas of Hills Neighbourhood zoned land where subdivision is allowed without the limitations imposed by the zoning as per the subject property. In addition there a large areas of Suburban Neighbourhood and Deferred Urban Zoned land available for development without having to resort to selling existing Reserve Land.



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# STRONG OBJECTION TO THE PROPOSED REVOCATION OF ALL COMMUNITY LAND BUT SPECIFICALLY 25 CHAPMAN STREET, PORT LINCOLN

I am writing to voice my formal objection to the revocation of community land classification with regard to 25 Chapman Street, Port Lincoln

As a property owner of since September 1997 I have significant concerns with the reclassification for potential sale and possible sub division of this land for residential development.

After attending the disappointing on site information session held with representatives that were totally unprepared and unable to answer many of the questions raised and studying the documentation provided by Council I specifically wish to address the following points.

#### 1. Underutilisation and Lack of Community Function

I voice my objection to the land at 25 Chapman Street being termed as underutilised and having no community function and would like to question how this has been measured and labelled. This parcel of land is used regularly by children and adults in the area for nature play, general exercise and dog walking. It provides a natural corridor for wildlife as well as a native buffer zone between properties – all of which contribute to the general character and lifestyle which led us to purchase in this area originally. As we own a "regular" residential block within the area, this block of land has provided my children with the opportunity to engage with nature and spend countless hours exploring and engaging in their environment without the need for travel and transportation. I find it amusing that the Council chose to visit the site prior to announcing this proposed revocation mid-afternoon on a weekday during the school term to justify their decision to label it underutilised. The lack of a playground or development in the usual recognisable park form may mean that its use isn't easily recognisable, but doesn't mean it isn't important to our neighbourhood or that it doesn't provide a community function - and once it is lost, it is lost forever.

#### 2. Questionable Affordable Residential Housing.

The revocation of community land so that the property at 25 Chapman Street can be sold for affordable housing is unrealistic and a blatant money grab. This property is covered with granite and native vegetation and due to terrain and natural waterway adjacent, provides limited development opportunities. Realistically this property only provides space for a small number of houses given the requirement for waste and storm water management so as not to impact this waterway and neighbouring properties. The prevalence of large granite boulders throughout the block suggest major implications for the need to install self-contained wastewater management beneath the ground and the fact that the sewerage line stops at the top of Bay View Road means connection to the sewerage system would be prohibitive at best. All of these factors would require the property to either be sold for an extremely cheap price so future owners could afford to overcome these issues – or mean that the value of any properties would not fall within the "affordable" price bracket simply due to the cost to install this basic infrastructure.

#### 3. Cost of Maintenance

I would like to query the actual cost incurred by Council for the maintenance of this property at 25 Chapman Street. I have worked from home for the last 23 years and can count on my fingers the number of times I have witnessed any work or maintenance being undertaken at 25 Chapman Street in that time. The occasional spraying of the fire track and roadside seems to predominantly be the only maintenance done, sprinkled with a couple of incidents

of small areas of grass being mown since the CFS and MFS ceased the regular burn off in the early 2000's. We do not have footpaths in the surrounding streets and residents in this area are forced to maintain the Kerbsides themselves as Council mowing ceases at the bottom of Bay View Road. I would be interested to know what Council records show with regard to attendance and maintenance of this area in general – let alone for this particular parcel of land other than our weekly rubbish collection. The expenditure "saved" to be repurposed into other community assets would be minimal – yet our Council Rates have increased significantly due to the value of our houses (which are valued as such due to the character of the area) and would be affected by the development of this area.

#### 4. Stormwater, Sewerage & Drainage

Development of 25 Chapman Street would have implications for the natural waterway that flows between 19 Sarah Crescent and 25 Chapman Street. The development that has taken place on property on Walter Street, above 25 Chapman Street, is already causing concern with regard to the redirection of Storm Water and any further disruption to the natural drainage within this area poses significant flooding risks for surrounding properties whilst putting additional pressure on existing storm water and drainage systems. The ceasing of the Sewerage line at the top of Bay View Road also has implications for development.

#### 5. Suitability of Purpose

I fail to see how revocation of this parcel of land actually fits within the "Opportunities to better use these parcels of land to meet current and future demands for our community" other than as a means of raising funds. Council claims that they wish for the land to be better used to deliver broader community benefits such as Childcare, Housing and Aged Care Facilities however this parcel of land isn't suitable for use as a Childcare or Aged Care site and provides limited housing opportunities. It seems that the situation within a sought after area and potential sale price are driving the revocation of community land – not the meeting of demands.

Please note the objection of myself and my family to the revocation of this Community Land Regards Dear Port Lincoln City Council,

# Re: Revocation of Land and Greyhound Road

Thank you for the opportunity to provide comment on the recent proposal for Land Revocation within Port Lincoln City Council.

I note that there are a number of other matters currently relating to the development of the the City, notably the desalination plant and related infrastructure works and the Master Plan for Regional Development. I think it is best to consider these other plans and proposals in tandem with the proposals for the community land revocation.

My principal suggestion is that the land at Chapman Street, part of the Monalena land (NOT the scrub – retain for birds and amenity) and at Oswald Drive be sold and that the proceeds be put to good use in remediation work of the old dump and trainline/ponds at Greyhound Road. This is because the dump site and ponds at Greyhound Road are a disgrace and an environmental disaster currently and must be fixed as a matter of urgency. The ponds are a haven for birdlife and could be a major tourist attraction and a haven for the birds. They are near the new housing development at the Marina – surely these residents are adversely impacted by this mess?

If the proposal for urban development in the Explorer Drive / Nootina Road area goes ahead, the retention of some of the Monalena land as open space will become more essential.

The Oswald Drive area would fetch a high price and could also be sold IF the money gained was used for the environmental works at Greyhound Road, in my view.

It seems reasonable to me to utilise the Willason Street / Trigg reserve land for childcare, but it is unclear to me whether or not the Council intends to sell or lease the land?

The Harbourview land seems ideally suited for a part and I am pleased to see that the proposal includes retention of a portion of the land for this purpose. I accept the need to build more aged care facilities.



# SUBMISSION REVOCATION OF COMMUNITY LAND

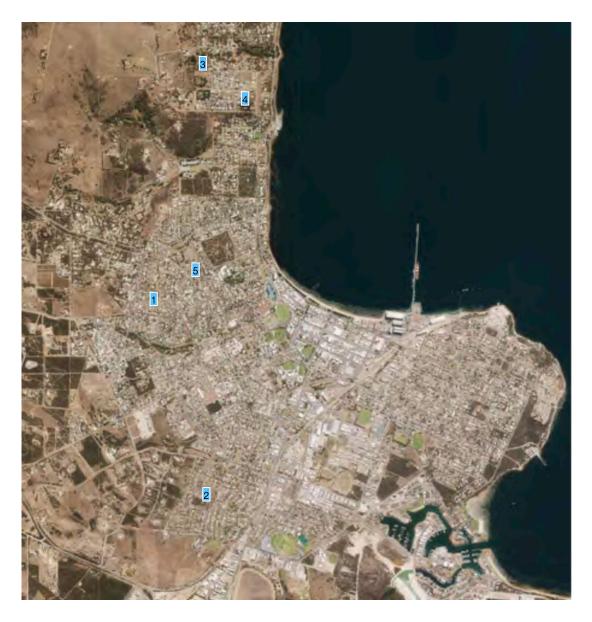


23 May 2025

# **INTRODUCTION**

This submission is provided for Council's consideration and is in response to the public invitation for feedback. Information in the "Proposal" document has been examined and I have undertaken viewings of each of the five sites. To understand the general contextual arrangement of these sites, the following aerial photo of Port Lincoln depicts their locations.

Nature Maps is the reference source.



The "Proposal" report states (pg. 1) that;

- a. "Community land ... is set aside for the benefit of the greater public ... and for use by and the enjoyment of the public ..."
- b. "community expectations and priorities change in regard to how community land should be managed."
- c. In terms of managing community land, factors considered are "cultural and historic relevance of the land, changing population demographics, community needs and shifts ins leisure trends."

The "Proposal" report then stated (pg. 2) "the land could be better used to deliver broader community benefits...", and it referred to five Council strategy documents.

#### What could have been added to the assessment?

- Community expectations also include green space and vegetation, biodiversity plantings and habitat. In this sense, would not there be a greater benefit to the public to provide some focus on ecological restoration?
- It appears that no environmental nor biodiversity analysis has been factored into the individual site assessments. Sites 1, 2, 3, and 4 would have benefited accordingly.
- Council's *Environmental Sustainability Strategy 2025-2034* contains three of five "Actions" (pg. 1) to which Sites 1, 2, and 3 are relevant, and maybe Site 4. The 10-Year Action Plan (pg. 8) attests to the inclusion of "Towards Net Zero", "Climate Resilience", and "Biodiversity" actions.
- Council's *Strategic Directions Plan 2025-2034* Goal 4 Sustainable Environment provides significant strategic actions directly related to Sites 1, 2, and 3.

#### The purpose of these areas

Although not clearly stated in the "Proposal" report, it is likely these parcels of land - or at least Sites 1, 2, and 3 - evolved from former residential subdivisions. Accordingly, they have become the responsibility for Council to maintain and manage for the public good in-perpetuity.

The public good also means the quality of the physical environment of a neighbourhood, and that includes the natural environment and one that has evolved as bare space.

"Broader community benefits" could have been produced many years ago if a vision involved a revegetated urban environment context, particularly one that may have replaced vegetation removal for residential development. Each of Sites 1, 2, and 3, and conceivably Site 4 could then have become a significant urban asset.

# **Summary**

- (1) Site 1 should remain as community land but with a very different approach to how it is regenerated and managed. This land is not appropriate for redevelopment for housing, including aged care accommodation.
- (2) Site 2 has merit in substantial, but not whole, revocation for housing development. The caveat is that the existing vegetated area should be retained and combined with the adjoining land that appears to be a reserve.
- (3) The case for revocation of Site 3 has not been fully established given that it was originally created as a public "Reserve". It is likely that the residential allotment yield would not be significant. The risk is that the property would not transform to expectations that would be hoped for. Site constraints (e.g. watercourse) should be registered accordingly.
- (4) Site 4 could be revoked as community land, given that it has low exposure, is a difficult site, has awkward access, and is near other Crown land that also needs attention. That may be the trade-off.
- (5) Site 5 is relatively small and has a strong connection with the adjoining early learning centre, therefore this parcel could be revoked as community land.

My reasonings are now described below.

#### **SITE 1 - Harbourview Reserve**

#### **Observations**

- Contains 3 titles produced from 1958 and 1965, and subsequently denoted "Reserve"
- Combined area = 2.05 ha
- Generally neglected space, very little investment has been directed to making it an important site for the general community and to support environmental and biodiversity goals.
- Lies in an area surrounded by residential development and is the only public space within a reasonable distance to another - the Heritage Trail.
- Within the context of Port Lincoln, this site has significant value as a revegetated urban space that aligns with Council's

Environmental Sustainability Strategy.



- The case for revocation has not been comprehensively established, as the environmental benefit has not been included in the "Proposal" report, which also stated that "this land has been identified as potentially surplus to community needs in its current form" (pg. 4). It is submitted that as no alternative has been countenanced, other than for residential development, then the case for revocation has not been established. No other option outside the "current form" has been identified. The land is denoted "Reserve", thus implying a parkland setting.
- Similarly, the "Proposal" report did not identify that the parcel of land receives urban runoff at a point source. Therefore the land could be further assessed for a localised stormwater detention system involving a constructed wetland. This system could perform a vital function in local catchment management, including being a key part of a redesigned park.
- This site would better serve the whole community by being retained as public space, but with a significantly different appearance and role. Viewed as a 'wasteland' space it is waiting for the hand of care based on a landscape design and being suitably revegetated using organised volunteer effort with support from Council. As an example of what can be achieved, consider the Catholic Cemetery revegetation project which is still in progress, and which predominantly contains understorey and groundcover plants that provide much needed habitat. This example provides an example for many other open spaces (larger and small) using

- volunteer input. One of the objectives of the proposed Eyre Peninsula Environment Centre at Mark Street is to establish "local" neighbourhood revegetation projects (called "Re-green Port Lincoln").
- The "Proposal" report indicated the prospects of the parcel of land for aged care accommodation, which is said to be "a critical community need". I submit that there are other sites available. For example, a better site is at the 3 ha Army Cadet property located on the aerial photo above. This aspect was noted in my brief submission on the *Housing Strategy 2024-2029* and also in my recent submission on the Master Plan, and would require Council's initiative in finding an alternative location for the Army activity.
  - Another potential site is at Site 2 below (Seaview Park), which would give this locality a much-needed lift.
- The "Proposal" report stated that a 1000 sq.m. portion would be retained in the event of the land being resumed for development. It is submitted that this pocket size space is a poor trade-off and would not be useful in the context of community use. Such tiny spaces are at risk of becoming neglected spaces that suffer under-investment.

#### SITE 2 - Seaview Park

#### **Observations**

- Contains a single title
- Area 1.99 ha
- Generally has suffered underinvestment and has low amenity value and low neighbourhood perceptions (see Image 2)
- Adjoins an existing parcel of open space that contains a tiny remnant of mallee woodland (see Image 2a)
- This woodland has recently suffered a fire and a considerable pile of rubbish is evident.

- The "Proposal" report states that the land would be used for "social and affordable housing". Although it might initially seem to be acceptable, the concern is the continual aggregation of such accommodation in an existing low-income housing setting.
- In any respect the land is suitable for revocation from community purposes for the common good.
- It is submitted the site should retain the existing remnant native vegetation (see Image 2a and 2b) such that cleared land only is available for residential development.





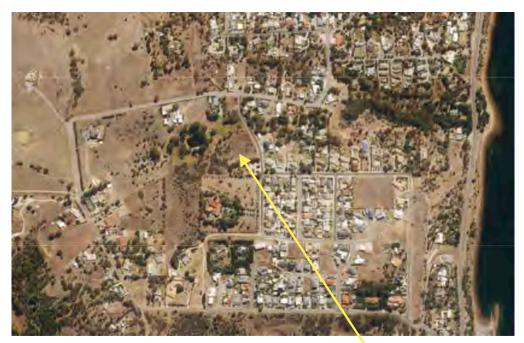


Image 2a

Image 2b

• This remnant could be combined with the adjoining 1.146ha of land, which presumably is Community Land.

# SITE 3 - Chapman Street



#### Observations

- Single title created in 2000 from a survey plan prepared in 1981
- Denoted "Reserve" on the Title, area = 1.686 ha
- Lies in a locality that contains mixed property sizes, from usual residential size to larger size (0.5 ha to greater than 1 ha)
- A watercourse traverses the north-western corner of the property.
- A bore also lies on the northern side and in the watercourse.
- Acacia vegetation lies over the western portion, redgum lie in the watercourse.



- As a dedicated "Reserve", it is noted that almost no environmental investment has been undertaken on the land for 25 years, and not since the initial survey plan was created in 1981. This should not be the primary reason to abandon the "Reserve" status.
- Purported residential development might occur, but in the event of disposal of the land Council should consider environmental factors, and a density appropriate to the locality.
- Given a range of site constraints, this site would not yield many lots, therefore the reason for revocation on the basis of a "housing shortage" is questionable. Does Council merely wish to offload this land?
- The watercourse should be placed in an appropriate width easement, although other easements exist on the Title.

• The property may well be best to remain as an improved biodiversity site in support of Council's Environmental Sustainability Strategy.

#### **SITE 4 - Oswald Drive**

#### **Observations**

- Almost landlocked area of 0.86 ha, denoted "Reserve" on the title in 1988.
- A difficult site with limited scope for residential development.
- Stony outcrops and steep unusable space over the southern half, which contains a range of planted trees of some value.
- Two property drainage pits and sewer connection points lie adjacent the northern boundary, presumably for future development (that has not happened).
- The southern half is likely to be economically unviable to develop.



- It is agreed that there may not be a tangible community attachment to this land, given its present condition. Therefore revocation could occur, but only if supported with wider community analysis about its potential environmental benefit.
- The reason for revocation in the "Proposal" report on the basis of a "housing shortage" is questionable.
- Practical cost-effective housing yield might be at best two.
- This land lies near Crown land of approximate area 2 ha, as shown in the adjacent image. Council is presumably the custodian, and as is apparent there has been little if any investment in the environmental and amenity values that should be attributed to the land.
- As an alternative action, and on the basis of a tradeoff for better local environmental outcomes, it is submitted that proceeds from revocation and disposal of the subject Site could be directed to the Crown land parcel. As described in Site 1 above, this land could be part of a revegetation project involving community voluntary effort, with Council's support.



# SITE 5 - Trigg Street Reserve

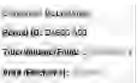
#### **Observations**

- According to Nature Maps, this site is contained on a single title on which also lies the early learning centre (see adjacent details)
- Area = 0.37 ha
- · Located in a residential area.

#### Conclusions

 Given that the existing early learning centre lies on community land, then revocation of the whole would be appropriate to accommodate the intended purpose to develop a childcare centre.





#### **FINAL COMMENTS**

The "Proposal" report states that the proceeds of sale would be placed in Council's "Land and Building Reserve".

In conformity with my assessment and excluding Site 1, an additional approach for consideration is that the loss of community land (Site 2, 3, 4, and 5 - nearly 4.5ha) could be used as a complementary offset elsewhere. In other words, 4.5ha loss of community land shall be allocated to a higher value community land project, so that there is no net loss.

As an example, Council land at Murray's Point which is presently zoned "Deferred Urban" could be allocated this 4.5ha as a "significant environmental benefit" for the common good. I have presented a case for comprehensive assessment and rezoning of the Murray's point locality in my recent Master Plan submission.

A tangible risk is presented at Sites 3 and 4 where revocation and subsequent sale could conceivably result in just two additional houses, resulting in a negligible addition to Port Lincoln's housing stock. New owners could also hold the land without undertaking development. In this scenario, both sites could be better off by retention as community land but with creative design as biodiversity sites. In this way, Council would be upholding the *Environmental Sustainability Strategy 2025-2034* and the *Strategic Directions Plan 2025-2034*.



#### TO WHOM IT MAY CONCERN

We OPPOSE the proposal of the PLCC to revoke the dedication of FIVE (5) Community Recreational Reserves to uses as determined by the PLCC. Although the Council has assured us that Port Lincoln has more than the mandated amount of Community Land, we feel that, if at all possible, this is an achievement they should be proud of and encourage rather than reduce it to a lesser standard.

We specifically object to the potential development of <u>Harbourview Reserve</u>, Highview Drive given we live directly opposite that reserve and can add qualified, firsthand comment.

# **CHALLENGES OF CONSULTATION and COMMUNICATION**

Information regarding PLCC's proposal was initially mainly spread through 'word of mouth' and many people were not aware of it. In the days prior to the designated meeting times, some nearby houses received notice in their letterboxes. The community meetings were held on a Saturday morning, which is when young families - the very people who are the heaviest users of many recreational reserves - are at club sports. One landowner whose property actually borders Harbourview Reserve, only wandered over to that Saturday 11am meeting because he saw approximately 80 people gathering. We accept that ensuring information is received by all stakeholders is a difficult task and have since found ourselves that a concerted effort is needed for wider reach and more meaningful consultation.

The meeting at Harbourview Reserve for information giving and individual chats with Councillors or Council employees afforded little opportunity for those attending to respond. Since then, we have been assured that written responses will be considered and PLCC will listen to their community in this process. However, as there are still local residents who are unaware of the Proposal for Revocation of Community Land, it seems that a slightly more generous time frame may have been needed.

# **PLCC'S CLAIM OF UNDER UTILISATION**

We can only make qualified comment regarding Harbourview Reserve that this reserve, being a larger area of comparably flatter open land in a low-traffic area, IS CONSISTENTLY patronised across every day of the week and over many hours of each day. We are retired, so we see the comings and goings.

Dog owners are there each morning and late afternoon/ evening. Throughout the day cars arrive, or people arrive on foot - Mums or Dads with babies in pushers and toddlers toddling. How many Port Lincoln kids had their first ever swing at Harbourview Reserve? School-aged children can safely walk or ride to the park from surrounding streets. At the meeting, we were told by a Council representative that everyone just "might have to drive to another park". Surely this is counterintuitive in today's context, where we are all encouraged to move more and pollute less?

Some weekends see a number of vehicles arrive and people gathered around the shed, table and BBQ facilities to enjoy family and friends' social gatherings and events. The Orienteering group and Emergency Services have also used this particular reserve for gathering and training purposes. The area is big enough to be safely used for ballgames, frisbee throwing and kite-flying without being too close to roads or residences. The suggestion that any development would see the playground retained in a new, smaller position would not cater for these possibilities.

We personally use Harbourview Reserve every day, taking our dog and our son's dog for their daily walk. Being larger than the dedicated Dog Park, it allows them to really run and still remain within the Reserve's boundaries. We see other dog owners with more active breeds who also use this park for the strenuous exercise their pets require.

Recent research papers expound the importance of Community Recreational Reserves in best practice city planning. Mental health continues to be a real and significant issue across our communities and research clearly highlights the correlation between community recreational reserves on both mental and physical health... 'proximity to green spaces and exposure levels were significant determinants of psychological well-being in individuals'.

(https://www.csu.edu.au/social-impact/environment/greenspaces-and-mental-health)

Some users of this park simply come to enjoy the space, peace and the views for which it is named. When walking the dogs and gaining valuable physical exercise ourselves, we too appreciate the quiet time to be in a natural environment with so much room to move and opportunity for reflection.

Such amenities as this reserve offer are used by many, many Port Lincoln people and visitors, not just those adjacent to it.

#### **NATURAL ENVIRONMENT**

As well as the green space and mature native trees, we have recognised at least 10 different species of birds that live in this park. From our observations, the numbers and variety of birds have certainly increased in recent years.

'Green spaces are not only beneficial to people but also vital for the environment. These areas serve as natural filters...They also play a crucial role in biodiversity conservation by providing a habitat for a wide range of plant and animal species.'

(https://www.detsi.qld.gov.au/our-department/news-media/down-to-earth/why-are-green-spaces-good-for-us)

# PLCC'S CLAIMS MAINTENANCE AND UPKEEP COSTS ARE TOO HIGH

Costs to maintain Harbourview Reserve were said to be \$20000/ annum, covering intermittent mowing and more regular raking of the playground sand (by Bedford workers). There is very little other maintenance involved in this park. We do not consider this cost to be significant. As ratepayers, we have a right to these minimal Council services; and the benefits of this open space being easily accessible to such a large number of residents situated between New West Road and Flinders Highway (and beyond) ought to be seriously considered. Other smaller and steeper reserves in the vicinity are not able to be enjoyed in the same way as Harbourview Reserve is.

We see that users of this park also care for it, we and most others make sure they are picking up after their dogs and some of us remove the minimal litter to the Council's or their own bin.

#### **PROPERTY VALUES**

The PLCC said at the On Park Gathering "they do not foresee loss of property values" because of the potential of having an Aged Care facility or other development on Harbourview Reserve. Whilst it may not be a 'right' of residents to have a view, the views and proximity to a reserve certainly enhanced the amenity and increased the purchase price of nearby properties. Advice sought and gained from local real estate agents is that these properties would indeed decrease in value in the event that this Revocation of Community Land were to proceed.

Being adjacent to this open space was a major factor in our decision to purchase our house (from a past Mayor, Mr Tom Secker) in the early 1990s. Over this time, we have seen continued development and increased population within the area and countless families making the most of the open space that they specifically chose to be near. Undoubtedly, the privilege of easily accessing Harbourview Reserve was also a factor in the prices paid for land and properties, as well as the Council rates based on these values.

# **CONCLUSION**

We also have firsthand experience of the need for Aged Care, having recently been unable to secure 'a bed' in either Matthew Flinders Home or Pioneer Village for a family member. The reasons given for their extensive waiting lists were a severe shortage of qualified staff. We were explicitly told that there were physical beds available within these facilities but nurses and Aged Care workers were not available to meet the ratios needed to operate at capacity. The Council CEO denied this but a nurse attending the meeting (and a number of others since then) informed us that there are currently agency nurses being accommodated within these facilities in place of those who so desperately need the service.

IF such staffing issues were able to be resolved, allowing an additional Aged Care home to be opened and effectively administered, there are surely other suitable locations without the need to destroy an established park?

The Council 'is aware of market interest in Harbourview Reserve as a site for a retirement village or aged care facility' (City of Port Lincoln Proposal document) but, once sold to developers, this land could well be used for other purposes with no guarantee of any such benefit to the broader community.

We and others have attempted to suggest alternative sites that have been spoken about in the community as being preferable for the development of housing or other facility/ies but we are not aware of all factors involved with various parcels of land. Discussion at the meeting indicated that private landholders have attempted to work with PLCC, over a number of years, regarding sale of their land for development and we sincerely hope that other possibilities are successful rather than the loss of Community Land.

Green spaces have been shown to foster happiness and wellbeing and spending time outdoors encourages physical activity, benefiting both physical and mental health. As well as improving the comfort, health and wellbeing of people living in towns and cities, open areas also enhance biodiversity and wildlife in urban areas

(https://www.climatechange.environment.nsw.gov.au/impacts-climate-change/built-environment/green-cover-and-open-spaces)

If PLCC proceeds with their plan to sell our Community Land for development, this loss becomes irreversible, with permanent impact on the people and the environment which make Port Lincoln a strong community in liveable, well-balanced surroundings. We strongly urge PLCC to retain Harbourview Reserve as an accessible open space for residents of our city to enjoy and continue to utilise for exercise, play, socialising and wellbeing.

We submit our feedback in good faith, and appreciate the Council and the responsible Minister giving their time and careful consideration to our concerns. Thank you





# Submission on the Proposed Revocation of Community Land

From: West Coast Youth and Community Support (WCYCS)

Date: 04 June 2025

# Affordable Housing – The Need for Equity and Integration

The shortage of affordable housing is having a significant impact on families, young people, and individuals across Port Lincoln. We commend Council for its proactive approach to addressing this issue by identifying land for potential development.

However, we urge Council to avoid concentrating all affordable housing developments within one area, particularly in Lincoln South. While this area is home to a warm, family-oriented primary school with a strong focus on student wellbeing, it carries an entrenched stigma that has resulted in low enrolments.

This school delivers inclusive, culturally responsive education with a clear emphasis on literacy, Aboriginal student engagement, social skilling, and emotional wellbeing in a safe and nurturing environment. It fosters a positive sense of self-worth in students and upholds strong community values. Importantly, its culturally diverse student population enriches the learning environment and builds empathy, cultural understanding, and resilience among all children.

Spreading affordable housing more broadly across Port Lincoln would not only help reduce the stigma attached to certain neighbourhoods but would also allow more families to engage with and benefit from schools like this one. It would promote equity, improve social cohesion, and strengthen community identity.

#### Childcare – A Barrier to Participation

The lack of accessible childcare services is a major issue for local families. It prevents many parents—particularly mothers, from returning to the workforce, creating economic pressure and reducing workforce participation at a time when NGOs and other employers are already struggling to attract and retain staff. We support the development of additional childcare facilities, including the proposed use of Trigg Street Reserve for this purpose, as a vital investment in our social and economic future.

# **Aged Care – Keeping Families Connected**

With limited aged care availability in Port Lincoln, many older residents are being forced to leave the area to access appropriate care. This disconnection from family and community causes emotional distress and exacerbates isolation. Repurposing land such as Harbourview Reserve to support aged care development is a necessary and compassionate response to a well-documented and urgent need.

# Conclusion

WCYCS supports the City of Port Lincoln's proposal to revoke the community land status of selected parcels to enable meaningful development aligned with community needs. We encourage Council to approach this initiative with a strong equity lens—ensuring housing, childcare, and aged care developments are distributed in a way that unites, rather than divides, our community.

Sincerely,
Narelle Biddell
Chief Executive Officer
West Coast Youth and Community Support (WCYCS)



I acknowledge the traditional owners of country throughout South Australia, their spiritual heritage, living culture and our walk together towards reconciliation.





# REGIONAL DEVELOPMENT AUSTRALIA EYRE PENINSULA

Chief Executive Officer City of Port Lincoln PO Box 1787 Port Lincoln SA 5606

BY EMAIL: yoursay@plcc.sa.gov.au

2 June 2025

**Dear CEO** 

# **Revocation of Community Land**

I hereby provide feedback on Council's proposal to revoke the community land classification at five Councilowned parcels of land at the following sites:

- Harbourview Reserve Highview Drive
- Seaview Park- Monalena Street
- Trigg Street Reserve Willison Street
- 10 Oswald Drive
- 25 Chapman Street

As the key regional economic development agency on the Eyre Peninsula, Regional Development Australia Eyre Peninsula (RDAEP) is committed to strengthening the region's economy through supporting economic growth and strong communities by investment in infrastructure across the region.

RDAEP commends the leadership being shown by Council to strategically address critical shortages facing the community in respect to housing, childcare and aged care. These are all issues that will be further exacerbated in coming years. As a result, RDAEP supports Council's proposal to commerce a process to engage with the broader community about revoking the community land status for these parcels of land for the purpose of encouraging the private and/or not-for-profit sectors to specifically develop retirement villages/aged care facilities, affordable and social housing/standard residential housing and early learning/childcare centres.

EYRE

As Council is aware, RDAEP has been proactive in identifying the challenges and options in the provision of infrastructure relating to housing development across the Eyre Peninsula and in July 2024 commissioned a report from URPS defining the problem and outlining a proactive approach to possible solutions.

https://www.rdaep.org.au/wp-content/uploads/2024/08/Infrastructure-Challenges-and-Options-Paper-Final.pdf

RDAEP with support from the South Australian Government also commissioned a report to address the lack of available places for long day care, occasional care, and early childhood education on Eyre Peninsula to create a comprehensive business case to advocate for investment in early childhood education and care and to meet parent's capacity to work, industry needs and to address children's developmental needs.

 $\underline{https://www.rdaep.org.au/wp-content/uploads/2024/01/Eyre-Peninsula-Early-Education-and-Care-November-2023-3.pdf}$ 

In the new financial year, we also intend to commission a report on aged care demand across the Eyre Peninsula and have held initial discussions with providers and been receiving the common message that waiting lists and demand in Port Lincoln and surrounding region far outstrips available places. Aged accommodation and care, like childcare, operate on slim financial markets and any in-kind assistance that can get a project off the ground should be encouraged.

These proposed projects align with the goals of the Eyre Peninsula Strategic Regional Plan 2023-26:

#### Priority Area 1: Housing and Accommodation

Strategy: Increase housing supply, mix and choice to support population growth.

Action: Investigate opportunities to establish private and public partnerships for the delivery

of regional housing developments.

# Priority Area 3: Aged, Disability and Child Care

Strategy: Facilitate greater access to aged and childcare services to drive workforce

participation in the region

Action: Work with State Government, Local Government, Schools and independent childcare

operators to identify and remove barriers to facilitate investment in childcare centres.

Once again, I congratulate Council on this initiative to address the shortage of housing, aged care and child care facilities.

Yours sincerely

Ryan Viney

Chief Executive Officer

**Director Regional Development**