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Alex O'Mara
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NSW Department of Planning, Industry and Environment
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By email: gsp.whitepaper@dpie.nsw.gov.au

Dear Ms O'Mara,

National Trust submission relating to Greater Sydney Parklands White Paper

The National Trust of Australia (NSW) thanks the NSW Department of Planning, Industry and Environment for the opportunity to provide this submission on the Greater Sydney Parklands White Paper and thanks the Department for the overall extension to submissions.

Parklands White Paper

The NSW Government established a new authority known as Greater Sydney Parklands to manage some of the city's most significant open spaces, including Centennial Parklands, Western Sydney Parklands, Parramatta Park, Callan Park and Fernhill Estate.

We understand that the preferred option put forward in the White Paper is the model for one umbrella Parklands Trust that acts as the trust for different parks across Sydney and can be a stronger advocate for our green open spaces and funding.

There is broad community concern that under the Greater Sydney Parklands model the Trust appears to operate more like a public sector agency than a custodian of the parklands. We note that Alex Greenwich, Independent Member for Sydney states

“Grassroots collaboration with the people who care most about the parklands is vital for the long term protection and enhancement of the parklands, especially under a model with more centralised direction and management” and we support the concept of strong, local input into the management, use and future of these important public assets.

It is essential that any overall authority builds community and local input, direction and control into its framework, and continues to make decisions that use the natural and cultural heritage values of the parks as their basis. This submission sets out our views in more detail.

Moving to a centralised organisation

The White Paper proposes to develop an overall umbrella Parklands Trust (with its own Act) that will oversee the direction, management and use of the Parks. This is not a new model, but rather mimics existing models and organisations that manage diverse portfolios of heritage places via one organisation, such as National Parks, the Harbour Trust, Sydney Living Museums and the National Trust as the owner of 33 heritage places across NSW.

It would, however, be naïve to assume that the process of moving from independent, locally run parks to a centralised management and operational will be smooth or easy. Whilst there are likely to be operational and



managerial efficiencies and cost savings **eventually**, the time and cost of changing models is extensive, and if not done in a collaborative, transparent and consultative manner, will be fraught with long lasting difficulties.

Furthermore, it is important to note that while these parks are important as large areas of open space for Sydney, they remain local community resources, integral to the quality of life for local residents. Any centralised management must remain cognizant of this important fact.

We strongly recommend that the government workshop this process with organisations that have gone through similar structural changes to develop a well-planned, people-focused, collaborative process and to identify potential pitfalls before they are encountered.

Amending legislation needs to protect local, place based approaches to the Parks

The White Paper proposes to create a new umbrella Act for the Greater Parklands organisation, but to also retain the existing suite of individual Parks Acts and amend them so that they align with the new Parklands Trust Act.

We acknowledge that, for the efficient operation of the new umbrella organisation, alignment of the various Acts will need to occur however there is scope for the localised nature of the individual Acts to be lost in the process.

We recommend that the process of establishing the new legislation should happen hand-in-hand with the proposed amendments to the existing Acts. This will create a transparent process and ensure that community and local stakeholders are completely aware of how the new Act will impact their existing park's Acts from the outset.

The new Act will also need to ensure that it captures both an overall framework for the operation of the umbrella organisation while still ensuring a localised approach that responds to the unique needs of each park.

Heritage within the Parks

Each of the Parks within the organisation are unique – they have different users and uses, different values and different requirements for their operation. In particular, each has its own heritage and natural values that cannot be sympathetically managed with a “one size fits all” approach.

It is imperative that each Park continues to have up-to-date Conservation Management Plans that outline the place's significant values and contains robust polices to ensure that decision making is made from the basis of significance, not on basis of commercial returns or streamlined processes. Furthermore, it is important that all staff are aware of the CMPs and their relevant heritage management policies, including those involved in maintenance and repairs.

The National Trust also maintain that CMPs and Masterplans for all parks must consider the sites as a whole. We remain concerned that the most recent Masterplan for Callan Park did not include the historic “Kirkbride” buildings which must be considered at the core of any ongoing management for that place, and would be concerned if other Parks (such as Fernhill)

We recommend that up to date, best practice Conservation Management Plans (CMPs) are prepared (or updated) for each Park and are formally adopted as the basis for their management and future direction.

Role of Community Trustee Boards

The White paper proposed to establish a new Greater Sydney Parklands Trust Strategic Board plus Community Trustee Boards for each Park. In particular, it proposes:

- The establishment of a skills-based, strategic board with common membership across the new GSP Trust and the existing park Trusts to provide strategic oversight of park management within the terms of the new and existing Trusts' legislation.
- The establishment of Community Trustee Boards to represent community voices and advise the GSP Trust. The Community Trustee Boards would provide advice from a local perspective on park stewardship, usage and activities plus environmental, heritage and cultural issue and the GSP Trust



would be required to consider the advice of the community trustee boards in its strategic oversight of the Parklands Estate.

The Community Trustee Boards would appoint those with a demonstrated interest in and sound knowledge of parks and activities, and the ability to communicate effectively with residents, community groups and park visitors.

- Preparation of a new **Consultation, Engagement and Advocacy Framework** that sets out how the Trust will listen to both local and wider views across Greater Sydney and can ensure equal access to the park and park facilities, and provide a consistent approach to consultation and engagement with the community.

We are concerned that the role of the Community Trustee Boards is proposed to be ‘advisory’ only. This model will not support meaningful community contribution and the continuation of adequate local input. We also have concerns that the proposed backgrounds and skills of the Community Trustee Boards are based solely on technical expertise at the expense of general community input.

We strongly recommend that the Community Trustee Boards have more than an advisory role and that the GSP Trust should not simply ‘consider’ their advice, but be required to integrate it into their planning decisions.

We also strongly recommend that the Community Trustee Boards integrate a mix of technical expertise with general community representation to ensure meaningful local input to the planning and management of the Parks.

Commercialisation of areas within the Parks

There are as many bad examples of commercialisation of public parks and spaces as there are good examples. Whilst it is understandable that the GSP aims for more economic stability of the Parks it manages, it is imperative that the cumulative impact of commercial operations does not outweigh the natural, cultural and recreational functions of the Parks; which is indeed their primary role.

Any commercial activity models and “offsite business hubs” in in Parklands should not be based on an arbitrary “2% of parklands” rule but should respond to the particular needs of each park.

We strongly recommend the preparation of Conservation Management Plans for each park that seek to identify what areas of the Park could be used for such purposes, that establish buffer areas around these activities and hubs, and the greater parklands areas, and that assess the cumulative impact of individual proposals on the overall significance and values of the Park.

We further recommend that the Conservation Management Plans be prepared in consultation with the community and stakeholders, and be publicly advertised for broader comment prior to their adoption. Any subsequent business proposals should also undergo community consultation and feedback to ensure participation and most importantly, to ensure transparency of decision making about the use of public assets.

Thank you again for the opportunity to provide this feedback and we look forward to the future opportunity of continued community input.

Yours sincerely,

Jane Alexander
Advocacy Manager