

INQUIRY INTO GREATER SYDNEY PARKLANDS TRUST BILL 2021

Organisation: Blacktown City Council

Date Received: 16 December 2021



File no: F21/1861

15 December 2021

The Director
Select Committee on the Greater Sydney Parklands Trust Bill
Parliament House
Macquarie Street
SYDNEY NSW 2000

By email: parklands@parliament.nsw.gov.au

Dear Sir or Madam

Inquiry into the Greater Sydney Parklands Trust Bill 2021

Thank you for your invitation to make a submission to the Inquiry by the NSW Legislative Council's Select Committee into the Greater Sydney Parklands Trust Bill 2021. I appreciate you bringing this matter to my attention.

I have attached a report that outlines Council's previous resolutions and our submissions to the Department of Planning, Industry and Environment on this matter. I request that the matters raised in the attached report be considered by the Select Committee at the Inquiry.

If you would like to discuss this matter further, please contact our Director City Planning and Development, Peter Conroy

Yours faithfully

Kerry Robinson OAM
Chief Executive Officer

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Submission to the Inquiry into the Greater Sydney Parklands Trust Bill 2021

December 2021

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1. Executive summary

This report outlines Blacktown City Council's submission to the NSW Legislative Council's Select Committee on the Inquiry into the Greater Sydney Parklands Trust Bill 2021.

We understand that the Inquiry Terms of Reference are:

- “1. That:
 - (a) *a select committee be established to inquire into and report on the provisions of the Greater Sydney Parklands Trust Bill 2021, and*
2. *That the committee report by Monday 21 February 2022.”*

Blacktown City Council has previously considered the NSW Government's *White Paper – Parklands for People, A proposed legislative framework for Greater Sydney Parklands* and the *Draft Exposure Bill for the Greater Sydney Parklands*. We have made three submissions on these documents to the Department of Planning, Industry and Environment.

We submit that the matters raised in our submissions to the Department of Planning, Industry and Environment should be considered by the NSW Legislative Council's Select Committee on the Inquiry into the Greater Sydney Parklands Trust Bill 2021.

This report provides:

- an overview of Blacktown City
- Blacktown City Council's resolutions in the relation to the White Paper and Draft Exposure Bill
- Blacktown City Council's submissions on the White Paper and Draft Exposure Bill.

A copy of the full Council reports and submissions is included in the Appendices.

2. Overview of Blacktown City

Blacktown City is 35 kilometres from the Sydney CBD, occupying 247 square kilometres on the Cumberland Plain. Eastern Creek, South Creek, Ropes Creek and Toongabbie Creek and their tributaries provide natural corridors that buffer areas of urban development.

Our City's current population of 403,000 is one of the fastest growing in Australia, and within 10 years it will be home to more than 500,000 people. The NSW Government forecasts that by 2041, Blacktown City's population will exceed 600,000 people. We want to optimise this growth and use it to provide the people who live and work here with more opportunities, better services and connections, and the right mix of different types of homes, open spaces and centres.

Blacktown City is the sporting capital of Western Sydney. Its world-class sporting venues and events include the Blacktown International Sportspark. Residents enjoy engaging or participating in sport and recreation activities, although participation varies between communities and age groups. Life expectancy rates in Blacktown City are lower than State and national averages, and rates of mental illness, obesity and diabetes are increasing.

Better access to open space and sport and recreation facilities will help to improve people's health and make it easier to interact and feel a sense of belonging. Equitable access to all our sports and recreation facilities, including access for people with a disability, requires NSW Government funding assistance. We know that both land and resources are limited – this requires us to keep existing facilities well-maintained and maximise their use, for example by removing barriers to participation for various groups within the community

Our benchmark is that all dwellings should be within 400 m of open space, with high density development within 200 m. Together with the private, community and sporting sector, we provide sportsgrounds, fields, courts, skateparks, pools and indoor sports facilities. Open space in our City comprises local, regional and State land, including within and around the Western Sydney Parklands, Blacktown International Sportspark, Eastern Creek, Bungaribee Creek, Prospect Reservoir, Rouse Hill Regional Park, and along rail and road corridors. Some of these areas are used for organised and informal recreation while others include walking tracks, trails and bicycle paths.

Our aim is to work with the NSW Government to extend the Western Sydney Parklands north along Eastern Creek, to connect with South Creek and the Hawkesbury River. This is also a Priority Corridor in the NSW Government's Central City District Plan. This extension would create new open space and recreation areas while improving tree canopy cover, biodiversity and creek management in the North West Growth Area.

Demand for sporting facilities will grow as our young population increases and ages. While planning for the North West Growth Area will add 150 new parks, 17 new sportsgrounds and 65 new courts, we've seen higher-than-planned densities being developed in this area – which means more people will live in the North West Growth Area than expected, and there will be a need for even more facilities. This requires substantial land and funding. The NSW Government regulatory framework around development contributions constrains our ability to address the funding shortfall for the full range of facilities needed. We will continue to advocate to the NSW Government to rectify inequitable infrastructure funding policies.



3. Council resolutions on the White Paper

In June and August 2021, Blacktown City Council considered reports on the *White Paper – Parklands for People, A proposed legislative framework for Greater Sydney Parklands*. The resolutions from those Council meetings are outlined below.

Council Ordinary Meeting on 23 June 2021

At its Ordinary Meeting on 23 June 2021, Blacktown City Council resolved the following:

- “1. *The issues raised in this report form the basis of our submission.*
2. *Request that the NSW Government include local government representatives on Community Trustee Boards.*
3. *That a further report be provided to Council outlining the differences between Council’s submission and the White Paper, as a matter of urgency.”*

Council Ordinary Meeting on 25 August 2021

At its Ordinary Meeting on 25 August 2021, Blacktown City Council resolved the following:

- “1. *Note the submission to the Department of Planning, Industry and Environment on the White Paper.*
2. *Further representations be made to Department of Planning, Industry and Environment including the following items:*
 - a. *Council's consultant advice on the retail impact on the surrounding business centres for Doonside and Rooty Hill be referenced.*
 - b. *Council be consulted on any further developments within the Western Sydney Parklands where the Minister is the consent authority.”*

A full copy of the Council reports is included in the Appendices.

4. Council submissions on the White Paper

On 1 July and 17 September 2021, Blacktown City Council made submissions to the Department of Planning, Industry and Environment on the *White Paper – Parklands for People, A proposed legislative framework for Greater Sydney Parklands*.

A summary of the matters raised in our submissions on the White Paper are outlined below:

Greater Sydney Parklands management options

Our submission outlined the need to clarify:

- the relationship between existing trusts and the Greater Sydney Parklands Trust (the GSP trust)
- the delegated functions from the GSP Trust to the other trust boards
- whether the GSP board members will also be trustees of the current park trusts and how this will change current management arrangements
- how conflicts between individual trusts and the umbrella trust will be resolved
- how conflicts of interests (including perceived) will be managed, particularly around financial decisions of the GSP Trust.

Community consultation and Community Trustee Boards

Our submission outlined the following:

- the need for local government representatives to be included on Community Trustee Boards to ensure local matters are addressed
- noting that any consultation framework must not replace broader community engagement
- that there must be a requirement to consult with local government and relevant State agencies
- that there is a risk that the scope of influence of boards will be narrow, restricting meaningful influence on decisions within the parklands
- we recommended that any consultation framework include criteria establishing how advice received from Community Trustee Boards will be considered and addressed by the GSP Trust
- we sought clarification of how Community Trustee Boards will work with councils, particularly as parklands can cover multiple local government areas
- that legislation for Community Trustee Boards must require representatives from relevant LGAs, including First Nations people who have important knowledge of Greater Sydney and its cultural significance.

Funding and financing

Our submission outlined the following:

- the principles used to determine the location and function of business park hubs must be reviewed. We advocated that the principles need to emphasise the importance of integrating business park hubs into the parkland setting. This includes a focus on linkages, the interface with the parklands, the promotion of green infrastructure and the use of design excellence criteria as an assessment tool as it involves land that would otherwise be for parkland use, being removed.
- new development and environmental performance criteria be applied to assess proposals. This includes criteria that require integration into the parkland setting, primarily accessible to active and public transport and safe and efficient access for parkland users and nearby residents.
- the State Government recognise that not all parklands will have the same commercial opportunities, and that ongoing funding should be provided in addition to new revenue streams for the parks.

Creating new parks

Our submission outlined the following:

- there is no detail provided on how the GSP Trust will operate in terms of identifying and planning for open space as the city grows. We state that this should be a core responsibility.
- the White Paper does not establish how local government can be involved in the creation and management of the parklands, including how we will work with the GSP Trust and Community Trustee Boards.

Development within the Western Sydney Parklands

Our submission outlined the following:

- confirmed that the Eastern Creek Business Hub was an example of the impact that commercial operations in the Parklands can have on local centres and economy
- highlighted Council's role as a representative and advocate for the local community and that sufficient time and information needed to be provided to ensure that Local Government can be a constructive participant.

A full copy of our submissions is included in the Appendices.

5. Council resolution on the Draft Exposure Bill

In November 2021, Blacktown City Council considered a report on the *Draft Exposure Bill for the Greater Sydney Parklands*. The resolution from the Council meeting is outlined below.

Council Ordinary Meeting on 3 November 2021

At its Ordinary Meeting on 25 August 2021, Blacktown City Council resolved the following:

- “1. *Council reaffirms its concerns in relation to the lack of consultation in regard to the proposed establishment of a single agency to manage the planning and operation of parklands across the metropolitan area, as outlined in its previous submissions.*
2. *The Mayor write to the Premier, the Minister for Local Government, the Minister for Planning and Public Spaces and Local Government NSW urging that the consultation period be extended by a further 2 months so that Council can properly assess the draft legislation, engage with the local community and secure input from the newly elected Council.*
3. *The Mayor write to the Chief Executive of the Greater Sydney Parklands, Suellen Fitzgerald, and advise the Western Sydney Parklands Trust of Council's position in regard to the Draft Exposure Bill for Greater Sydney Parklands.*
4. *It be noted that Council has not reached a decision and does not endorse the Draft Exposure Bill for Greater Sydney Parklands.”*

A full copy of the Council reports is included in the Appendices.

6. Council submission on the Draft Exposure Bill

On 1 December 2021, Blacktown City Council made a submission to the Premier of NSW, the Minister for Planning and Public Spaces and the Greater Sydney Parklands on the *Draft Exposure Bill for the Greater Sydney Parklands*.

A summary of the matters raised in our submissions on the Draft Exposure Bill are outlined below:

Inadequate consultation

Our submission outlined the following:

- the consultation period concluding on 29 October 2021 has not considered the timing of the local government elections and associated caretaker period
- the submission deadline prevents local government from undertaking meaningful engagement with local communities.

Inequity and inconsistency across Greater Sydney

Our submission outlined the following:

- parks in Western Sydney are required to be self-funding, yet land within the Western Sydney Parklands has been sold or leased for commercial purposes

Greater Sydney Parklands management options

Our submission outlined the need to clarify:

- the model proposed further erodes the status of community parklands in Western Sydney, in so far as it proposes a management regime with limited knowledge of local history and conditions in relation to the Western Sydney Parklands.

A full copy of our submissions are included in the Appendices.

Appendices

Appendix 1 - Council reports on the White Paper

11.2. PD410027 - Greater Sydney Parklands White Paper

Director: Glennys James, Director Planning & Development
Responsible Manager: Chris Shannon, Manager Strategic Planning
File: F15/1234-03

Division is not required

Previous Item Not applicable

Topic *White Paper – Parklands for People, A proposed legislative framework for Greater Sydney Parklands* released by the Department of Planning, Industry and Environment.

Analysis The Department of Planning, Industry and Environment has released a *White Paper – Parklands, A proposed legislative framework for Greater Sydney Parklands* that recommends a legislative framework for the Greater Sydney Parklands agency that was established in July 2020 to manage certain Sydney parklands, including Western Sydney Parklands.

The White Paper recommends the Greater Sydney Parklands Trust as the state's manager for all existing and new parklands created over the next 50 years. The aim is to establish a trust, community trustee board and investigate funding streams for parklands under its control. At this stage, it is unclear how the existing trusts for each of the parklands will function with the new Greater Sydney Parklands Trust, how the reforms will improve management of the parklands, engagement with the community, the role of local government and how commercial opportunities will be used as a funding source for the parklands. The White Paper is currently on public exhibition and submissions close 5 July 2021.

Attachment/s

1. White Paper - Parklands for People [PD410027.1 - 32 pages]
2. 50 Year Vision - Greater Sydney Open Space and Parklands [PD410027.2 - 20 pages]

Report Recommendation

1. The issues raised in this report form the basis of our submission.
2. Request that the NSW Government include local government representatives on Community Trustee Boards.

Key reasons

1. Greater Sydney Parklands management options

- a. The NSW Government states that the current legislative framework does not support the vision for a parkland City that has a strong management, maintenance, conservation and community engagement. Further, it generates unnecessary costs which does not contribute to improving the parklands. There is also no

legislative capacity to expand the parklands estate and no prohibition on the sale of the parkland.

- b. The White Paper identifies the following options to manage the Greater Sydney Parklands:
 - one umbrella Trust with new legislation, while keeping existing Trusts and Acts
 - keep current framework
 - establish a new Trust and dissolve existing trusts
 - centralise ownership to one existing Trust and dissolve other trusts.
- c. The White Paper states that the current framework (bullet point 2 above) is not supported because it does not provide opportunities for expansion, growth or protection of the parklands estate or for community representation. Further, the NSW Government does not support the option of establishing a new trust, centralising ownership to the existing trust and dissolving the existing trusts. This is because these options will require significant change and reform to the existing trusts, removal of existing legislation and will not maintain local trusts which the community have indicated they would like to keep.
- d. The one umbrella trust option is recommended to ensure there is an agency that will advocate for and promote the green grid beyond the boundaries of each individual parkland. As the umbrella trust, the Greater Sydney Parklands Trust (GSP Trust) will operate in a multi-trust model with the board being appointed by the Minister for Planning and Public Spaces. The GSP Trust will have financial management, community consultation and leadership responsibilities for existing and new parks.
- e. The proposed relationship between the existing trusts and the GSP Trust is unclear. Further, information would be required to understand any delegated functions from the GSP Trust to the other trust boards, whether the GSP board members will also be trustees of the current park trusts and how this will change current management arrangements. Resolution of conflicts between individual trust boards and the umbrella trust board and how perceived conflicts of interests will be managed, particularly if financial decisions are controlled by the GSP Trust, also need to be clarified.

2. Community consultation and Community Trustee Boards

- a. The White Paper proposes preparation of a consultation, engagement and advocacy framework and ministerial approval of how the trusts will engage with the community. It recommends setting up Community Trustee Boards (CTB) for each park that will give advice from a local perspective on park stewardship, usage and activities, matters such as environmental, heritage and cultural issues, advice on plans of management and sustainable funding options. The CTB's will be selected through a public expression of interest process run by the GSP Trust with their role being to represent their local communities and ensure that knowledge specific to a place is considered.
- b. Whilst a CTB may be a good idea, it must not replace broader consultation and engagement with local communities. Any consultation framework must include a requirement to broadly consult with the wider community as well as local government and agencies.
- c. There is potential risk that CTBs may have a narrow scope of influence, restricted to advice on information provided by, or proposed by, the GSP Trust, with no meaningful influence on decision making and consultation. Any consultation framework must include criteria on how the advice from CTB, including how

changes or other ideas proposed, are considered and addressed by the GSP Trust.

- d. It is unclear how CTBs will work with councils, including parklands which cover multiple local government areas. Legislation drafted for CTB memberships should consider representatives from relevant local government areas and representatives from the First Nations people who have local knowledge of the parklands.

3. Funding and financing

- a. The White Paper states that more funding is needed for the Parklands Estate. Therefore, it proposes to investigate funding solutions for the Parklands, maintain protections in the existing legislation that prohibits land sale and retain the conservation function of the existing park trust Acts. The existing legislation is not always clear about acceptable levels of commercial activities across the parklands. The State Government therefore proposes to restrict any major new commercial activities to the existing commercial park precincts set out in current plans of management. The White Paper further states that business park hubs would be located on land with low environmental or recreational value.
- b. The principles that determine the location and type of business park hubs need to be reviewed. The standards need to be elevated to emphasise the importance of integrating business park hubs into parkland settings, such as a focus on linkages, the development interface with the parklands and the promotion of green infrastructure. The business park hubs should be assessed against design excellence criteria as they are taking away land that would otherwise be for parkland use.
- c. A more strenuous development and environmental performance criteria should be applied to assessing developments. They should be better integrated into the parkland setting and should be primarily accessible and supported by active and public transport. Safe and efficient access for residents to the parkland should outweigh any commercial use consideration.
- d. It is not clear whether all parks will have the same commercial opportunities. In this regard, the State Government should provide funding in addition to any potential new revenue stream for the parks. This will ensure that the parklands, which are created for public benefit, do not rely solely and primarily on income generated from commercial opportunities and fundraising activities that detract and restrict usage of the parklands.
- e. We call on the NSW Government to provide funding on an equitable basis to all parklands across Greater Sydney. This includes the NSW Government's commitment to extending the Western Sydney Parklands.
- f. The Western Sydney Parklands (WSP) northerly expansion is identified as a Priority Green Grid Corridor in the NSW Government's Central City District Plan. It states that this connection will enhance access to open space, recreation and greener urban landscapes for the growing population of the North West Growth Area. Future extensions north along Eastern Creek could connect the WSP to South Creek and the Hawkesbury River. A connection should also extend south linking to Schofields Station. The ownership and management of this land should be the responsibility of the WSP as identified in the Central City District Plan.

4. Creating new parks

- a. The White Paper proposes that the umbrella GSP Trust can take a city-wide approach to make the green grid connections, as well as focus on individual parks. New parks will be under the care and control of the GSP Trust.

- b. The White Paper makes generalised statements about taking a holistic approach to the care and management of the parks in partnership with communities, First Nations people, local government and other government agencies. It does not detail how local government can have meaningful involvement in the creation and management of these parklands and how the partnerships will function.
- c. There is also no detail provided on how the GSP Trust will operate in terms of identifying and planning for open space as the city grows. This should be a core planning responsibility of an agency whose main aim is to deliver and manage existing and new open space.

Supporting analysis

1. 50-year Vision for Greater Sydney's Open Space and Parklands

- a. On 24 May 2021, the Department of Planning, Industry and Environment released a final version of the 50-year Vision for Greater Sydney's Open Space and Parklands.
- b. It is an aspirational vision and seeks to establish the building blocks to achieve greener streets, better parklands and improved green links that together improve the quality of life of our communities.
- c. The 50-year Vision sets the following 4 strategic directions:
 - to grow parks for people
 - connect people to parks
 - keeping Sydney green and vibrant
 - caring for the environment.

2. White Paper – Parklands for People

- a. The White Paper was also released by the Department of Planning, Industry and Environment on 24 May 2021. The key approaches in the White Paper include:
 - creating new and amending legislation, as required, to establish an overarching GSP Trust that manages regionally significant parklands across Sydney and can manage new parks
 - maintaining the existing parkland trusts and local stewardship roles
 - integrating contemporary and holistic strategic planning for Sydney's network of parks within broader metropolitan planning processes
 - legislating a commitment to best practice community involvement in park planning, management and activation
 - building relationships and partnerships with First Nations peoples in the stewardship of parks
 - establishing CTBs to represent community voices and advise the new GSP Trust
 - introducing a sustainable financial operating model that allows appropriate commercial activities, and to ensure parklands can be managed properly in perpetuity.

Context

1. Creation of the Greater Sydney Parklands Trust

- a. The GSP agency was established in 2020 and is custodian of 6,000 hectares of parklands, including the Western Sydney Parklands, Centennial Parklands, Callan Park, Parramatta Park and Fernhill Estate.
- b. There are also 3 trusts shaped by 4 separate legislation that manages the 5 parks within the Parklands Estate. Each trust was established at different points in time and legislation was drafted to support independent management of the parks by individual trusts.
- c. It is understood that board members will continue as trustees to the current park trusts and operate in accordance with the legislation.
- d. The NSW Government's aim is to create management efficiencies through a single agency managing the Greater Sydney parklands.

End of report

PS3.1. PD410033 - Greater Western Sydney Parklands White Paper Submission

Director: Peter Conroy, Director City Planning & Development
Responsible Manager: Chris Shannon, Manager Strategic Planning
File: F15/1234-03

Division is not required

Previous item PD410027 – Greater Sydney Parklands White Paper

Topic Our submission on the *White Paper - Parklands for People, A proposed legislative framework for Greater Sydney Parklands*

Analysis The Department of Planning, Industry and Environment (DPIE) released a *White Paper - Parklands for People, A proposed legislative framework for Greater Sydney Parklands* (the White Paper) that recommends a legislative framework for the Greater Sydney Parklands agency. The agency is a body that was established in July 2020 to manage certain Sydney parklands, including the Western Sydney Parklands.

Council considered a report on this matter at its meeting on 23 June 2021 and resolved to prepare a submission based on the matters raised in the report. It also resolved that a further report be submitted back to Council outlining the detail of our submission.

We made a submission to DPIE dated 1 July 2021 in accordance with Council's resolution.

Attachment/s 1. Submission on the White Paper [**PD410033.1** - 3 pages]

Report Recommendation Note the submission to Department of Planning, Industry and Environment on the White Paper.

Committee Recommendation

1. Note the submission to Department of Planning, Industry and Environment on the White Paper.
2. Further representations be made to Department of Planning, Industry and Environment including the following items:
 - a. Council's consultant advice on the retail impact on the surrounding business centres for Doonside and Rooty Hill be referenced.
 - b. Council be consulted on any further developments within the Western Sydney Parklands where the Minister is the consent authority.

Council Resolution 1. Note the submission to Department of Planning, Industry and Environment on the White Paper.

2. Further representations be made to Department of Planning, Industry and Environment including the following items:
 - a. Council's consultant advice on the retail impact on the surrounding business centres for Doonside and Rooty Hill be referenced.
 - b. Council be consulted on any further developments within the Western Sydney Parklands where the Minister is the consent authority.

Key reasons

1. On 23 June 2021, Council considered a report on the *White Paper - Parklands for People, A proposed legislative framework for Greater Sydney Parklands* (the White Paper). At that meeting, Council resolved:
 1. The issues raised in this report form the basis of our submission.
 2. Request that the NSW Government include local government representatives on Community Trustee Boards.
 3. That a further report be provided to Council outlining the differences between Council's submission and the White Paper, as a matter of urgency.'
2. We forwarded a submission to DPIE dated 1 July 2021 that covered the following matters:
 - a. Greater Sydney Parklands management options
 - b. Community consultant and Community Trustee Boards
 - c. Funding and finance
 - d. Creating new parks.

Supporting analysis

1. We forwarded a submission to DPIE on the White Paper in a letter dated 1 July 2021. The White Paper outlines a number of discussion points on which the NSW Government was seeking feedback. Outlined below is a summary of our views on these discussion points.
2. **Greater Sydney Parklands management options**
 - a. Our submission outlined the need to clarify:
 - the relationship between existing trusts and the Greater Sydney Parklands Trust (the GSP trust)
 - the delegated functions from the GSP Trust to the other trust boards
 - whether the GSP board members will also be trustees of the current park trusts and how this will change current management arrangements
 - how conflicts between individual trusts and the umbrella trust will be resolved
 - how conflicts of interests (including perceived) will be managed, particularly around financial decisions of the GSP Trust.

3. Community consultation and Community Trustee Boards

a. Our submission outlined the following:

- the need for local government representatives to be included on Community Trustee Boards to ensure local matters are addressed
- noting that any consultation framework must not replace broader community engagement
- that there must be a requirement to consult with local government and relevant State agencies
- that there is a risk that the scope of influence of boards will be narrow, restricting meaningful influence on decisions within the parklands
- we recommended that any consultation framework include criteria establishing how advice received from Community Trustee Boards will be considered and addressed by the GSP Trust
- we sought clarification of how Community Trustee Boards will work with councils, particularly as parklands can cover multiple local government areas
- that legislation for Community Trustee Boards must require representatives from relevant LGAs, including First Nations people who have important knowledge of Greater Sydney and its cultural significance.

4. Funding and financing

a. Our submission outlined the following:

- the principles used to determine the location and function of business park hubs must be reviewed. We advocated that the principles need to emphasise the importance of integrating business park hubs into the parkland setting. This includes a focus on linkages, the interface with the parklands, the promotion of green infrastructure and the use of design excellence criteria as an assessment tool as it involves land that would otherwise be for parkland use, being removed.
- new development and environmental performance criteria be applied to assess proposals. This includes criteria that require integration into the parkland setting, primarily accessible to active and public transport and safe and efficient access for parkland users and nearby residents.
- the State Government recognise that not all parklands will have the same commercial opportunities, and that ongoing funding should be provided in addition to new revenue streams for the parks.

5. Creating new parks

a. Our submission outlined the following:

- there is no detail provided on how the GSP Trust will operate in terms of identifying and planning for open space as the city grows. We state that this should be a core responsibility.
- the White Paper does not establish how local government can be involved in the creation and management of the parklands, including how we will work with the GSP Trust and Community Trustee Boards.

6. Our submission concluded by stating our understanding that there is no timeline provided for when this reform will be implemented. The public exhibition period for the White Paper closed on 5 July 2021 and DPIE have stated that a Submissions Report

and draft Exposure Bill will be released before the White Paper is introduced to Parliament.

End of report

Appendix 2 - Council submissions on the White Paper



File no: F15/1234-03

1 July 2021

Alex O'Mara
Group Deputy Secretary, Place, Design and Public Spaces
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 212

Dear Sir/Madam

Submission on the Greater Sydney Parklands White Paper

We welcome the opportunity to provide feedback on the *White Paper – Parklands for People, A proposed legislative framework for Greater Sydney Parklands* (the White Paper).

We support, in principle, the White Paper's proposal to manage the Greater Sydney Parklands, including Western Sydney Parklands. However, there are certain aspects of the White Paper that we would like you to consider. These are detailed in the attachment to this letter.

Council considered a report on the White Paper at its meeting on 23 June 2021 and resolved that:

- '1. The issues raised in this report form the basis of our submission.*
- 2. Request that the NSW Government include local government representatives on Community Trustee Boards.*
- 3. That a further report be provided to Council outlining the differences between Council's submission and the White Paper, as a matter of urgency.'*

A copy of the Council report, highlighting 13 matters of concerns, is attached for your information.

We request that you address the 13 specific matters raised in our submission as part of your consideration of the White Paper.

If you have any questions regarding our submission, please contact Chris Shannon, Manager Strategic Planning

Yours faithfully,

Kerry Robinson OAM
Chief Executive Officer

Connect - Create - Celebrate

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown Council's submission on the *White Paper – Parklands for People, A proposed legislative framework for Greater Sydney Parklands (White Paper)*

1. Greater Sydney Parklands management options

The White Paper proposes that the Greater Sydney Parklands Trust (the GSP Trust) will be the umbrella trust to manage the Parklands and to operate in a multi-trust model with the trustees for the current Parklands.

- a. It is unclear about the proposed relationship between the existing trusts and the GSP Trust.
- b. There needs to be greater clarity on the delegated functions from the GSP Trust to the other trust boards, whether the GSP board members will also be trustees of the current park trusts and how this will change current management arrangements.
- c. There also needs to be clarification on the resolution of conflicts between individual trust boards and the umbrella trust board, and how perceived conflicts of interests will be managed, particularly if financial decisions are controlled by the GSP Trust.

2. Community consultation and Community Trustee Boards

The White Paper recommends setting up Community Trustee Boards selected through a public expression of interest process run by the GSP Trust for each park.

- a. It is imperative that these Boards also include local government representatives to ensure local matters are addressed. Whilst a Community Trustee Board may be a good idea, it must not replace broader consultation and engagement with local communities. Any consultation framework must include a requirement to broadly consult with the wider community as well as local government and agencies.
- b. There is potential risk for Boards to have a narrow scope of influence, restricted to advice on information provided by, or proposed by, the GSP Trust, with no meaningful influence on decision making and consultation.
- c. We recommend that any consultation framework must include criteria on how the advice from a Community Trustee Board, including how changes or other proposed ideas proposed are considered and addressed by the GSP Trust.
- d. It is also unclear how these Boards will work with councils, including parklands which cover multiple local government areas. Legislation drafted for Community Trustee Board memberships should consider representatives from relevant local government areas and representatives from the First Nations people who have local knowledge of the parklands.

3. Funding and financing

The White Paper proposes investigating funding solutions for the Parklands, maintaining protections in the existing legislation that prohibits land sale and retaining the conservation function of the existing park trust Acts. It recommends creating 'off park' business hubs as a funding mechanism.

- a. The principles that determine the location and type of these business park hubs is unclear and needs to be reviewed. The standards need to be elevated to emphasise the importance of integrating business park hubs into parkland settings, such as a focus on linkages, the development interface with the parklands and the promotion of green infrastructure.
- b. The business park hubs should be assessed against design excellence criteria as they are taking away land that would otherwise be for parkland use.
- c. More strenuous development and environmental performance criteria should be applied to assess developments. They should be better integrated into the parkland setting and should be primarily accessible and supported by active and public transport. Safe and efficient access for residents to the parkland should outweigh any commercial use consideration.
- d. It is also not clear whether all parks will have the same commercial opportunities. In this regard, the State Government should provide funding in addition to any potential new revenue stream for the parks. This will ensure that the parklands, which are created for public benefit, do not rely solely and primarily on income generated from commercial opportunities and fundraising activities that detract and restrict usage of the parklands.

4. Creating new parks

The White Paper makes generalised statements about taking a holistic approach to the care and management of the parks in partnership with communities, First Nations people, local government and other government agencies.

- a. There is no detail provided on how the GSP Trust will operate in terms of identifying and planning for open space as the city grows. This should be a core planning responsibility of an agency whose main aim is to deliver and manage existing and new open space.
- b. It does not detail how local government can have meaningful involvement in the creation and management of these parklands and how the partnerships will function.



File no: F15/1234-03

17 September 2021

Alex O'Mara
Group Deputy Secretary, Place, Design and Public Spaces
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2150

Dear Ms O'Mara

Eastern Creek Business Hub (ECBH), Western Sydney Parklands

I write to provide additional information in support our previous submission on the Greater Sydney Parklands White Paper dated 1 July 2021.

Further to that submission, Council considered a further report on this matter at its Ordinary Meeting on 25 August 2021. At that meeting Council resolved, in part, that:

'Further representations be made to Department of Planning, Industry and Environment including the following items:

- a. Council's consultant advice on the retail impact on the surrounding business centres for Doonside and Rooty Hill be referenced.
- b. Council being consulted on any further developments within the Western Sydney Parklands where the Minister is the consent authority.'

In regard to point a., in 2020, Council commissioned SGS Economics and Planning to prepare a Commercial Centres Study for Blacktown City. Part of that study considered the impact of the Eastern Creek Business Hub on nearby centres. It found that the Business Hub is likely to have a negative impact on the trading performance of nearby centres, particularly on the Rooty Hill centre. I have attached an extract from that study.

The Eastern Creek Business Hub is located on leased land within the Western Sydney Parklands. Its purpose is to generate income to maintain and improve the Parklands. It provides an example of the impact that commercial operations in the Parklands can have on local centres and economy.

In regard to point b., as a significant portion of the Western Sydney Parklands are located within Blacktown City, Council would like to emphasise:

- Council's role as a representative and advocate for the local community

Connect - Create - Celebrate

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

- The need for Council to be afforded sufficient time and information so as to ensure that it can constructively participate in any deliberations involving the planning and development of the parklands.

Please consider this additional information and Council's Resolution with our previous submission dated 1 July 2021.

If you have any questions regarding our submission, please contact Chris Shannon,
Manager Strategic Planning

Yours faithfully

Kerry Robinson OAM
Chief Executive Officer

Tulloch Street is just off Richmond Road and is relatively inaccessible by foot, and so does not have high levels of exposure or walkability and is likely to be the most vulnerable neighbourhood centre in the future.

Mount Druitt Quadrant South

The Mount Druitt South sub-catchment is composed of centres generally near to or south of the train line in the Mount Druitt Quadrant, except for the Mount Druitt Centre, which is a strategic centre and sub-regional retail centre and has a retail catchment covering a large area. The estimated future performance of the Mount Druitt South sub-catchment, and the additional retail floorspace demand within this sub-catchment is shown in the tables below. The Rooty Hill neighbourhood centre on Evans Road is grouped with Rooty Hill.

TABLE 36: FUTURE RETAIL PERFORMANCE IN THE MOUNT DRUITT SOUTH SUB-CATCHMENT

Retail centre	2019 Floorspace	Additional Floorspace 2019-36	Floorspace capacity – medium scenario	Change in trading performance Scenarios (impact of online)		
				Low online	Medium online	High online
Rooty Hill	8,728	0	112,570	14.7%	9.2%	2.1%
Minchinbury	1,665	0	0	7.9%	2.4%	-8.2%
Mount Druitt Road, Mount Druitt	1,607	0	0	18.7%	15.5%	10.6%
Total	12,001	0	112,570	14.3%	9.1%	1.8%

TABLE 37: FUTURE RETAIL FLOORSPEC DEMAND IN THE MOUNT DRUITT SOUTH SUB-CATCHMENT

Retail Catchment	2019 Floorspace	Additional Floorspace 2019-36	Unmet retail floorspace demand 2019-2038 Scenarios (impact of online)		
			Low online	Medium online	High online
Mount Druitt South sub-catchment	12,001	0	1,718	1,091	214

Retail demand is expected to grow in this catchment, driven by forecast population growth around the train line. There is a small amount of additional retail demand expected in this area, but it is relatively modest and substantially smaller than the floorspace capacity available.

Rooty Hill

The Eastern Creek Business Hub is located in this area but has been included in the homemaker precincts category as this is its primary function. The opening of this centre is likely to have an impact on trading performance within the sub-catchment, particularly on the nearby Rooty Hill centre. A new retail centre has been developed in the Business Hub, including a supermarket and specialty retail. This is likely to directly compete with Rooty Hill.

While Table 24 shows an increase in retail performance of Rooty Hill by 2036, this will not occur if population growth is below expectations (as encoded in Forecast.id) or consumers prefer the convenience offered by the new shopping centre associated with the Eastern Creek Business Hub more than anticipated in the retail model, which calculates likely retail attractiveness based on the new centre having average levels of trading performance. In

addition, if the Business Hub has a different tenant profile than assumed in the modelling, this may increase the impact on Rooty Hill.

Given the uncertainty regarding the impact of the Eastern Creek Business Hub on the Rooty Hill centre and the modest size of the additional retail demand expected by 2036, planning should seek to bolster Rooty Hill's retailing viability within its current centre boundaries. The northern half of the centre (along Rooty Hill Road North) is the primary retail area, with a smaller strip of shops south of the railway line.

Rooty Hill Road North has a fine-grain shopping street layout, which is its competitive advantage compared to other nearby centres. To retain this competitive advantage, retail development should be focused along Rooty Hill Road North to maintain activity and vibrancy along it, with any expansion of the centre occurring along Rooty Hill Road North or on roads leading from it (for example on North Parade).

West HQ Development

West HQ is located between Rooty Hill and the Mount Druitt Centre, was recently expanded and contains a large club, restaurants, a Novotel Hotel and a 2000 seat theatre. The theatre and club are likely to have a regional-scale catchment extending well beyond the Mount Druitt area. Given its large catchment and distance from a train station (West HQ is around one kilometre from Rooty Hill Station, which is the nearest train station), it is largely to be accessed mostly by car. This means that people are likely to drive to and from the theatre and club rather than staying in the area around performances and events, and so the potential benefits of the West HQ development for the Rooty Hill and Mount Druitt centres are limited.

Nonetheless, there may be a market for some additional hospitality development in Rooty Hill catering to people coming to events at West HQ. The point of distinction of Rooty Hill compared to other centres or to the premises within West HQ is its fine-grain retail streetscape. This bolsters the importance of maintaining Rooty Hill Road North as the location with the primary retail function in Rooty Hill.

Minchinbury

The model predicts that the trading performance of Minchinbury will increase slightly. Its central location within the suburb of Minchinbury (which is cut off from Mount Druitt by the Great Western Highway) means that it is likely to continue to be the most convenient day to day shopping destination for this catchment. It is also co-located with a primary school, contributing to its prospects as the centre of the local community.

There is limited scope for expansion of this centre, but there is not likely to be significant additional retail demand in the future to warrant an expansion. Given the lack of other retail facilities nearby and the central role of this centre in the surrounding suburb, Council should ensure that any retail development along the Great Western Highway does not harm Minchinbury's viability.

Mount Druitt Road

Mount Druitt Road is a small retail centre containing a Friendly Grocer and a range of specialty retail premises and services. It is a traditional shopping stress with a high level of amenity. It is located within a high-density residential zone in which some recent apartment development has occurred, creating the prospect of future population growth. As a result it is forecast to have a large increase in trading performance in the future. If population growth in the immediate surrounds is lower than expected, retail performance may not increase.

Despite its forecast future increase in trading performance, Mount Druitt Road has only a small supermarket and is very near the Mount Druitt Centre, which is likely to significantly outcompete it. This creates vulnerabilities for the Mount Druitt Road centre.

The Mount Druitt Road centre should be protected in the future and its retail function maintained. A small expansion in retail floorspace may be appropriate. While there is limited

Appendix 3 - Council report on the Draft Exposure Bill

3.11. PD410052 - Draft Exposure Bill for Greater Sydney Parklands

Director: Peter Conroy, Director City Planning & Development
Responsible Manager: Chris Shannon, Manager Strategic Planning
Matthew O'Connor, Manager Recreational Planning & Design
File: F15/1234-03

Division is not required

Previous item PD410027
PD410033

Topic Draft Greater Sydney Parklands legislation released by the Department of Planning, Industry and Environment.

Analysis The NSW Government has released draft legislation relating to the proposed Greater Sydney Parklands (comprising the Western Sydney Parklands, Moore Park, Centennial Park, Callan Park and Parramatta Park). Refer attachment 1 to this report.

The public consultation period for the draft legislation closes on 29 October 2021.

The imminent conclusion of the consultation period:

- is complicated by the upcoming local government elections and associated caretaker period
- does not provide local government with sufficient time to meaningfully engage with local communities.

The model being proposed in the legislation reinforces inequities and inconsistencies across the city, whereby:

- parks in western Sydney are required to be self-funding
- lands within Western Sydney parks have been sold or leased for commercial purposes, reducing the quantity of open space available and, in relation to retail developments on the parklands, undermining the viability of nearby established neighbourhood centres.

The model proposed further erodes the status of community parklands in Western Sydney, in so far as it proposes a management regime with limited knowledge of local history and conditions in relation to the Western Sydney Parklands.

Council needs time to consult with stakeholders on these and other matters.

Attachment/s

1. NSW Draft Bill - Greater Sydney Parklands Trust Bill 2021 [PD410052.1 - 50 pages]
2. Previous report to Council - PD410027 - Greater Sydney Parklands White Paper [PD410052.2 - 57 pages]
3. Previous report to Council - PD410033 - Greater Western Sydney Parklands White Paper Submissio [PD410052.3 - 4

- pages]
4. Letter to Department of Planning, Industry and Environment - submission on the Greater Sydney Pa [PD410052.4 - 3 pages]
 5. Letter to Department of Planning, Industry and Environment - Eastern Creek Business Hub, Western [PD410052.5 - 2 pages]

Report

Recommendation

1. Council reaffirms its concerns in relation to the proposed establishment of a single agency to manage the planning and operation of parklands across the metropolitan area, as outlined in its previous submissions.
2. The Mayor write to the Premier, the Minister for Local Government, the Minister for Planning and Public Spaces and Local Government NSW urging that the consultation period be extended by a further 2 months so that Council can properly assess the draft legislation, engage with the local community and secure input from the newly elected Council.

Committee

Recommendation

Council reaffirms its concerns in relation to the lack of consultation in regard to the proposed establishment of a single agency to manage the planning and operation of parklands across the metropolitan area, as outlined in its previous submissions.

The Mayor write to the Premier, the Minister for Local Government, the Minister for Planning and Public Spaces and Local Government NSW urging that the consultation period be extended by a further 2 months so that Council can properly assess the draft legislation, engage with the local community and secure input from the newly elected Council.

The Mayor write to the Chief Executive of the Greater Sydney Parklands, Suellen Fitzgerald, and advise the Western Sydney Parklands Trust of Council's position in regard to the Draft Exposure Bill for Greater Sydney Parklands.

It be noted that Council has not reached a decision and does not endorse the Draft Exposure Bill for Greater Sydney Parklands.

Key reasons

1. Historic Land Management Practices

- a. Long established Eastern Suburbs parks such as Centennial Pak have generally been managed and maintained through direct State Government funding.
- b. Conversely, parks in Western Sydney have been required to be self-funding to support their day to day operations. When income generating assets have been developed to support recreation and open space operations, this has on occasions occurred in the form of recreation land being converted to commercial or employment lands.
- c. The down sides of this approach to the financial management of Western Sydney parks has taken many forms, for example:
 - Established local neighbourhood centres have been impacted by the

opportunistic use of former recreational land for commercial purposes such as supermarkets

- New commercial activities have been incorporated into the original parklands footprint, reducing the area available for recreation and open space purposes and ultimately impacting on local traffic conditions
- Land is sometimes lost forever through its “freehold” sale to third parties, rather than using leases, as occurs elsewhere across metropolitan Sydney.

2. Greater Sydney Parklands White Paper

- a. The White Paper recommended that the Greater Sydney Parklands Trust be the state’s manager for all existing and new metropolitan parklands created over the next 50 years. The White Paper covered matters in relation to:
 - i. Management
 - The NSW Government previously stated that the current legislative framework for the various parks does not support the vision for a parkland City that has a strong management, maintenance, conservation and community engagement.
 - The one umbrella trust option was recommended on Government’s assertion that a single agency will advocate for, and promote, the green grid beyond the boundaries of each individual parkland.
 - ii. Governance
 - The White Paper proposed setting up Community Trustee Boards for each park that will give advice from a local perspective on park stewardship, usage and activities, matters such as environmental, heritage and cultural issues, advice on plans of management and sustainable funding options.
 - iii. Financial arrangements
 - The White Paper stated that more funding was needed for the Parklands Estate. It proposed to investigate funding solutions for the Parklands, including:
 - restricting any major new commercial activities to the existing commercial park precincts as set out in current plans of management
 - business park hubs would be located on land with low environmental or recreational value.
 - iv. New parks
 - The White Paper proposed that the umbrella Greater Sydney Parklands Trust would take a city-wide approach to make green grid connections, as well as focus on individual parks.
 - The White Paper made generalised statements about taking a holistic approach to the care and management of the parks in partnership with communities, First Nations people, local government and other government agencies. It did not detail how local government would have meaningful involvement in the creation and management of these parklands and how the partnerships will function.

3. Council response Greater Sydney Parklands White Paper

- a. Council previously considered the White Paper at its meetings on 23 June and 25 August 2021. Refer attachments 2 and 3.

- b. Subsequent submissions in respect of the White Paper were made on both occasions. Refer attachments 4 and 5.
- c. Key aspects of Council's previous responses related to:
 - i. **Management options**
 - Our submission outlined the need to clarify:
 - the relationship between existing bodies
 - the delegation of functions
 - membership of the trust
 - how conflicts of interest will be managed.
 - ii. **Community Trustee Boards**
 - Our submission:
 - outlined the need for local government representatives to be included
 - reinforced the importance of engaging with the community
 - emphasised the need to consult with and work with local government.
 - iii. **Funding and finance**
 - Our submission:
 - observed the sensitivity of business parks and their location
 - outlined the need for performance criteria to assess proposals in relation to business parks
 - noted that not all parklands have the same commercial opportunities, and that ongoing funding should be provided in addition to new revenue streams for the parks.
 - iv. **Creating new parks**
 - Our submission:
 - acknowledged that no detail was provided in relation to identifying and planning for open space as the city grows
 - noted that no detail was provided about how local government would be involved in the creation and management of the parklands.
 - v. **Development within the Western Sydney Parklands**
 - Our submission:
 - confirmed that the Eastern Creek Business Hub was an example of the impact that commercial operations in the Parklands can have on local centres and economy
 - highlighted Council's role as a representative and advocate for the local community and that sufficient time and information needed to be provided to ensure that Local Government can be a constructive participant.

4. Draft legislation

- a. The NSW Government has prepared draft legislation relating to the proposed Greater Sydney Parklands comprising the Western Sydney Parklands, Moore Park, Centennial Park, Callan Park and Parramatta Park.
- b. The draft legislation has been exhibited for public comment until 29 October 2021.
- c. The draft legislation fails to clarify a number of Councils previously expressed concerns in relation to:

- Management options
 - Community Trustee Boards
 - Funding and finance
 - Creating new parks
 - Development within the Western Sydney Parklands.
- d. Furthermore, the consultation period does not give due consideration to either:
- The prevailing Covid-19 restrictions
 - upcoming local government elections and associated caretaker period.

Context

1. Stakeholder Engagement

- a. The White Paper made numerous references to matters such as:
- establishing Community Trustee Boards for each park that will give advice from a local perspective
 - taking a holistic approach to the care and management of the parks in partnership with communities, First Nations people, local government and other government agencies.
- b. The proposed 28-day consultation period, during the lead up the NSW Local Government Elections and associated Caretaker period, runs counter to these statements of engagement and collaboration with stakeholders.
- c. A request has been made to the Greater Sydney Parklands for an extension of time to engage with the local community and prepare a more informed submission. At the time of writing this report a response had not yet been received.

End of report

Appendix 4 - Council submissions on the Draft Exposure Bill



File no: F15/1234-03

1 December 2021

The Hon. Dominic Perrottet MP
Premier of NSW
GPO Box 5341
SYDNEY NSW 2001

Dear Premier

Draft Exposure Bill for the Greater Sydney Parklands

I write to inform you of Council's position in relation to the Draft Exposure Bill for the Greater Sydney Parklands.

Council considered a report on this matter at its Ordinary Meeting on 3 November 2021. At that meeting, Council resolved that:

- '1. Council reaffirms its concerns in relation to the lack of consultation in regard to the proposed establishment of a single agency to manage the planning and operation of parklands across the metropolitan area, as outlined in its previous submissions.
2. The Mayor write to the Premier, the Minister for Local Government, the Minister for Planning and Public Spaces and Local Government NSW urging that the consultation period be extended by a further 2 months so that Council can properly assess the draft legislation, engage with the local community and secure input from the newly elected Council.
3. The Mayor write to the Chief Executive of the Greater Sydney Parklands, Suellen Fitzgerald, and advise the Western Sydney Parklands Trust of Council's position in regard to the Draft Exposure Bill for Greater Sydney Parklands.
4. It be noted that Council has not reached a decision and does not endorse the Draft Exposure Bill for Greater Sydney Parklands.'

A copy of the Council report and our previous submissions to the Department of Planning, Industry and Environment are attached for your consideration.

Council believes that the consultation period that concluded on 29 October is complicated by the upcoming local government elections and associated caretaker period. It did not provide local government with sufficient time to meaningfully engage with local communities. We urge that the consultation period be extended by a further 2 months so that Council can properly assess the draft legislation, engage with the local community and secure input from the newly elected Council.

Our view is that the model being proposed in the legislation reinforces inequities and inconsistencies across the city, whereby:

- parks in Western Sydney are required to be self-funding

Mayor of Blacktown City
Councillor Tony Bleasdale OAM
Phone: 02 9839 6504 - Email: mayor@blacktown.nsw.gov.au
Correspondence: PO Box 63 - Blacktown NSW 2148
Facebook: Mayor of Blacktown City

- lands within the Western Sydney Parklands have been sold or leased for commercial purposes, reducing the quantity of open space available and, in relation to retail developments on the parklands, undermining the viability of nearby established neighbourhood centres.

Council believes that the model proposed further erodes the status of community parklands in Western Sydney, in so far as it proposes a management regime with limited knowledge of local history and conditions in relation to the Western Sydney Parklands. Council needs time to consult with stakeholders on these and other matters.

If you have any questions regarding this matter, please contact Kerry Robinson OAM, Chief Executive Officer [REDACTED]

Yours faithfully

[REDACTED]

Councillor Tony Bleasdale OAM
Mayor



File no: F15/1234-03

1 December 2021

The Hon. Rob Stokes MP
Minister for Planning and Public Spaces
GPO Box 5341
SYDNEY NSW 2001

Dear Minister

Draft Exposure Bill for the Greater Sydney Parklands

I write to inform you of Council's position in relation to the Draft Exposure Bill for the Greater Sydney Parklands.

Council considered a report on this matter at its Ordinary Meeting on 3 November 2021. At that meeting, Council resolved that:

1. Council reaffirms its concerns in relation to the lack of consultation in regard to the proposed establishment of a single agency to manage the planning and operation of parklands across the metropolitan area, as outlined in its previous submissions.
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A copy of the Council report and our previous submissions to the Department of Planning, Industry and Environment are attached for your consideration.

Council believes that the consultation period that concluded on 29 October is complicated by the upcoming local government elections and associated caretaker period. It did not provide local government with sufficient time to meaningfully engage with local communities. We urge that the consultation period be extended by a further 2 months so that Council can properly assess the draft legislation, engage with the local community and secure input from the newly elected Council.

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- lands within the Western Sydney Parklands have been sold or leased for commercial purposes, reducing the quantity of open space available and, in relation to retail developments on the parklands, undermining the viability of nearby established neighbourhood centres.

Council believes that the model proposed further erodes the status of community parklands in Western Sydney, in so far as it proposes a management regime with limited knowledge of local history and conditions in relation to the Western Sydney Parklands. Council needs time to consult with stakeholders on these and other matters.

If you have any questions regarding this matter, please contact Kerry Robinson OAM, Chief Executive Officer [REDACTED]

Yours faithfully

[REDACTED]
Councillor Tony Bleasdale OAM
Mayor



File no: F15/1234-03

1 December 2021

Suellen Fitzgerald
Greater Sydney Parklands
PO Box 3064
PARRAMATTA NSW 2124

Dear Ms Fitzgerald

Draft Exposure Bill for the Greater Sydney Parklands

I write to inform you of Council's position in relation to the Draft Exposure Bill for the Greater Sydney Parklands.

Council considered a further report on this matter at its Ordinary Meeting on 3 November 2021. At that meeting, Council resolved that:

- '1. Council reaffirms its concerns in relation to the lack of consultation in regard to the proposed establishment of a single agency to manage the planning and operation of parklands across the metropolitan area, as outlined in its previous submissions.
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A copy of the Council report and our previous submissions to the Department are attached for your consideration.

Council believes that the consultation period is complicated by the upcoming local government elections and associated caretaker period. It does not provide local government with sufficient time to meaningfully engage with local communities.

Our view is that the model being proposed in the legislation reinforces inequities and inconsistencies across the city, whereby:

- parks in Western Sydney are required to be self-funding
- lands within the Western Sydney Parklands have been sold or leased for commercial purposes, reducing the quantity of open space available and, in relation

Mayor of Blacktown City

Councillor Tony Bleasdale OAM

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to retail developments on the parklands, undermining the viability of nearby established neighbourhood centres.

The Council believes that the model proposed further erodes the status of community parklands in Western Sydney, in so far as it proposes a management regime with limited knowledge of local history and conditions in relation to the Western Sydney Parklands. Council needs time to consult with stakeholders on these and other matters.

If you have any questions regarding this matter, please contact Kerry Robinson OAM, Chief Executive Officer [REDACTED]

Yours sincerely

Councillor Tony Bleasdale OAM
Mayor