

**Submission
No 93**

**INQUIRY INTO GREATER SYDNEY PARKLANDS TRUST
BILL 2021**

Organisation: Greater Sydney Parklands

Date Received: 15 January 2022



**Greater Sydney
Parklands**

12 January 2022

The Director
Select Committee on the Greater Sydney Parklands Trust Bill 2021
Parliament House
Macquarie Street
SYDNEY NSW 2000

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

Dear Sir / Madam,

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

Please see submission attached on behalf of Greater Sydney Parklands.

We have no objection to our submission being published in full on the website including our agency name.

If you have any further questions, please contact Suellen Fitzgerald, Chief Executive, Greater Sydney Parklands

Yours sincerely

**Michael Rose AM
Chair
Greater Sydney Parklands**

**Suellen Fitzgerald
Chief Executive
Greater Sydney Parklands**



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

Terms of Reference

That a select committee be established to inquire into and report on the provisions of the Greater Sydney Parklands Trust Bill 2021 (the Bill) and that the committee report by Monday 21 February 2022. The media release announcing the inquiry noted the committee would inquire into the benefits of the legislation and any community concerns; in particular, in relation to concerns about potential commercialisation of Callan Park.

Purpose of the submission

As the agency with current governance and operational responsibilities for Greater Sydney Parklands (GSP), this submission is made to provide advice to the committee on how the provisions of the Bill may impact the agency's capacity to protect its Parklands estate and deliver on the NSW Government's 50-Year Vision for Sydney's Open Space and Parklands.

About Greater Sydney Parklands

As set out in the NSW Government's 50 Year Vision for Sydney's open spaces and parklands, Greater Sydney will evolve as a city within a park. This means increasing the amount of parkland through a network of connected green and blue spaces. The Government intends to create a legacy for the city that will be just as visionary as that of the city's forebears who, more than 100 years ago, set aside land for Parramatta Park, Moore Park and Centennial Park. As the city grows, so should its public parklands. GSP recognises that to achieve the outcome, the Government is seeking to put in place a unified governance framework and to support this with sustainable funding.

GSP was established as an interim administrative arrangement by the NSW Government in July 2020 to bring together the management of Western Sydney Parklands (WSP), Parramatta Park (PP), and Centennial Parklands and Moore Park (CPMP). The agency manages these parks under the terms of their respective legislation – *Western Sydney Parklands Act 2006*, *Parramatta Park Trust Act 2001* and *Centennial Park and Moore Park Acts 1983* – with common board members across all trusts, including members from each of the previous trust boards. A combined administration was also established.

In December 2020, the NSW Government brought 400ha at Fernhill Estate and 38ha at Callan Park under the GSP umbrella by transferring these parks to the appropriate associated legal entity – Fernhill Estate to Western Sydney Parklands Trust (WSPT)

and Callan Park to Centennial Park and Moore Park Trust (CPMPT). For matters relating to Callan Park, GSP must also comply with the terms of the *Callan Park (Special Provisions) Act 2002*.

This arrangement has been in place for 18 months, during which time GSP has harmonised and where appropriate, consolidated the administrative and operational activities of the individual parkland trusts to improve public access and amenity, remove administrative duplication, improve operational efficiencies and save costs by realising economies of scale.

About the 50-Year Vision for Sydney's Open Space and Parklands

The 50 Year Vision for Sydney's Open Space and Parklands set the direction to create a 'city within a park' and maintain and improve our city's abundant access to natural areas, parks, greenspace and waterways over the long term. For further information go to:

https://www.dpie.nsw.gov.au/_data/assets/pdf_file/0004/405265/50-Year-Vision-Greater-Sydney-Open-Space-and-Parklands.pdf

Greater Sydney Parklands' proposed operating model

The Bill proposes to establish a trust that builds on the WSPT operating model, established in 2006 by the then Labor government.

The WSP Act allows for a broad range of compatible public uses for the 27km long corridor, from bushland regeneration to urban farming; picnic grounds to Sydney's second zoo; and motorsports to mountain bike tracks. The funding model allows the Trust to generate income to manage the parklands, while increasing public access to quality parkland, and also providing jobs, investment and attractions in Western Sydney.

The WSPT business model has underpinned the ongoing expansion and investment in parkland facilities over the last 10 years, increasing visitation and engagement resulting in better community outcomes.

In 2012, WSPT took on the administration of World Heritage listed Parramatta Park, using its financial stability and professional capabilities to restore and rejuvenate the park, with better community consultation and without the loss of any local focus or heritage values. Outcomes for the Parramatta community have been:

- Complete restoration and adaptive reuse of heritage gatehouses at Mays Hill, Queens Road and George Street;
- Conservation and guided tours for the Government Dairy, Australia's oldest domestic building and extensive repairs to the park's heritage features;

- Two new playgrounds and accessible amenities blocks on the west and east park;
- Planning and trials to minimise cars in the park; and
- Restoration of the Crescent and the expansion of the Summer Series events program in partnership with Parramatta Council and Sydney Festival.

Greater Sydney Parklands' achievements to date

Despite the challenges of establishing a new interim arrangement and the demands of the COVID-19 pandemic, GSP has been able to realise some significant outcomes for the benefit of the community.

Growing parks for people

It was evident during the extended lockdown period, that our parklands became more important than ever for our local communities to escape, relax, exercise, and to promote good mental health and well-being. Despite COVID-19 restrictions, our parklands saw a minimum 20% growth in visitation in the past 12 months, with more than 40 million visits in total.

In the first year of GSP's establishment (2020-21), \$66M was spent on capital works across the Parklands, funded largely by NSW Government capital grants. This is an increase of \$25M from the previous year (2019-20) and included:

- \$10M in addressing key maintenance projects at Centennial Parklands,
- \$6M as part of a staged refurbishment of the Hordern Pavilion,
- \$2.7M in refurbishing heritage assets at Callan Park, including restoring 3 historic buildings for adaptive reuse, with the first of these publicly tendered for community use,
- \$2.2M on restoring World Heritage assets at Parramatta Park,
- Commencing \$10M in waterfront works at Callan Park, including creating more waterfront public space through the demolition of derelict waterfront buildings, and a kids pop up nature playground, and
- \$13.5M in constructing a new mountain bike track network and BMX circuit along with enhanced access to the Olympic Shooting Centre in the Western Sydney Parklands, in partnership with Liverpool Council. When complete in mid 2022, this development will be the largest adventure rider sports facility in Australia and will provide for families, local western Sydney clubs and major competition event use, not only for the south west Sydney community but also for bike riders right across Sydney and NSW.

Connecting people to parks

- At Centennial Parklands, we opened the Kensington Pond footbridge, completed Stage 2 of the Ponds Walk from the light rail stop and commenced work on the new cycle path at Queens Park.
- Parramatta Park was transformed during a 2-month trial of the People's Loop, a car-free space in the West Domain for walking, running, and cycling.

- At Callan Park a series of events, kids programs, guided tours and open days allowed more people Inner West community to connect with the history and potential future of the park.
- At Western Sydney Parklands \$6 million was invested in creating the Northern Bridge which connects Bungaribee Park to Blacktown International Sports Park at Blacktown. The new bridge crosses Eastern Creek and connects to the 2.3km Hearts Crossing Loop, which is part of the Parklands' 60km walking and cycling network.

Keeping Sydney green and vibrant

As a combined agency, we are well-placed to understand the significance of how people feel about our natural and cultural landscapes. We continue to work towards remarkable, memorable, and distinctive Parklands to suit the outdoor lifestyle and to attract people from around the city, state, Australia and the world.

We restored the Burramatta Landscape Trail to preserve Parramatta Park's archaeological subsurface layer using traditional methods in partnership with Darug traditional custodians. We also unveiled the Guriwal Trail at Centennial Parklands, teaching people about the area's native plants, animals, and the importance to ancient and continuing First Nations culture.

Caring for the environment

We support the native vegetation in our parks. We are continuously looking for smart and resilient solutions as we plan, manage, and maintain adaptable open spaces and Parklands to changes in climate, as these areas support and sustain biodiversity and important green and blue corridors within the parks.

- Centennial Parklands will reduce Net Zero Carbon Emissions by 50% in coming years, ensuring all GSP activities use renewable energy sources.
- Western Sydney Parklands is already operating on 100% Greenpower. In addition, 1,500 hectares of the Parklands has been part of bushland regeneration works expanding the Cumberland Plain Woodland, with 60,000 trees planted in the last 12 months. As part of this, 650 children from western Sydney schools have been involved and this program continues annually. We have seen the return of native flora and fauna, including the Regent Honeyeater at Fernhill Estate, the Powerful Owl at Centennial Parklands and kangaroos and wallabies at Western Sydney Parklands.

Working with the community

- Working with the community across a broad range of activities including 6 webinars with 443 participants, 9 letterbox drops, 17 information sessions, 70 stakeholder briefings, 2,780 project submissions, 8,000 returned surveys, 6 regular meetings with the Centennial Parklands Community Consultative Committee (CCC) and regular meetings with management of each of our 10 touchpoint councils.
- Community feedback has been sought and incorporated into our plans for Callan Park's Landscape Structure Plan; Centennial Parklands' draft Flying-fox Camp Management Plan, Callan Park's Companion Animal Management Plan, Parramatta Park's People's Loop; and the draft Fernhill Estate Plan of Management and Landscape Master Plan.
- At Moore Park East, GSP worked with the local community action group, Venues NSW, Transport for NSW and the relevant sporting codes to support the Government's

announcement to remove event parking from Moore Park East, after 100 years of on-grass parking. In response to ongoing community demand, GSP has replaced car parking at Upper Kippax with school cricket over the summer and is working with the community on a long term plan for increased recreation and sports facilities for the area. GSP supports these arrangements being cemented in the Bill provisions for CPMPT, with complete parking removal planned once the new carpark opens in 2023.

Greater Sydney Parklands Trust Bill 2021

The following commentary focuses on GSP's perspective, as an implementation agency, of potential implications and benefits of the Bill provisions.

GSP recognises that many of the provisions within the Bill will only apply to lands that the Greater Sydney Parklands Trust (GSPT) may own in future, for their protection and sustainable management, and do not necessarily apply to lands of the associated trusts, which remain governed by their existing legislation.

Governance structure and provisions

GSP is committed to protecting the special values of each of its parks, and those it may manage in the future, as well as taking a city wide, long term approach to implementing the Blue Green Grid across the city.

Proposed structure

GSP notes the Bill proposes a hybrid model; a new umbrella GSPT, while retaining all existing associated trusts' legislation. The umbrella GSPT has three key tasks: ownership and management of new NSW Government metropolitan urban parks; management of existing NSW Government metropolitan urban parks; and advocacy for parks and the 50-Year Vision's network goal of a 'city within a park'.

The hybrid model allows GSPT to protect the existing trust lands with their special and differing qualities, and at the same time creates a statutory framework, including a new set of objects, that can allow GSPT to take a city wide view and promote open space networks across the city.

In the absence of the umbrella trust and its objects, the objects and functions of the existing trusts' legislation require the board to deal with matters only as they relate to the trusts' land ownership and statutory boundaries, and would not support a role for GSPT to advocate to realise the 50-Year Vision for Sydney's parks.

Under the current individual trust arrangements, there is no statutory, consolidated voice for metropolitan urban parks in Sydney that responds to the community's considerable support for parks. The Bill provides a statutory entity to deliver a consolidated view to government, including in resource allocation decisions.

It has been GSP's experience over the last 18 months and in achieving the outcomes listed above, that a consolidated parks agency is 'stronger together', and will have the collective resources and expertise to deliver improved community outcomes.

Board makeup

The current trusts' respective legislation do not require specific knowledge/experience for board members. The Bill proposals to require specific knowledge/experience for board members will support better governance outcomes and give the community a greater level of confidence in board decisions.

Specific clauses

Some community concerns have been expressed over clauses 6 and 11 in relation to use of the words 'corporations' and 'joint ventures', suggestive of privatisation. Clause 6 is a standard provision for all the existing trusts' legislation and would allow GSPT to own land and hold funds as a public agency. Clause 11 is similar to a provision within the *WSP Act*. The clause has only been used to date to enter into biobanking agreements with private neighbours at Fernhill Estate to benefit ecological outcomes for the Parklands. GSP sees these clauses as being supportive of a government agency managing public lands effectively and for public benefit.

Dealings with Land

We note that all prohibitions on sale of Parklands continue under the existing trust acts and for any land that may be owned by GSPT in future, allowing GSPT to continue to protect its public Parklands.

Provisions that allow GSPT to enter into management agreements with other government agencies are similar to clauses within the *WSP Act* and could provide public benefits for new parks in Western Sydney in particular, such as enabling GSPT to manage infrastructure easements owned by other agencies (such as Sydney Water or National Parks and Wildlife Services) or to allow public access to long distance walking tracks. GSP sees an opportunity for these arrangements to support improved collaboration and efficiencies between government agencies for better community outcomes, ultimately enhancing green and blue grid corridors across Greater Sydney.

In relation to maximum lease lengths, GSP notes the balance within the Bill between community concern about alienation of public land under private lease and the tenure requirements for private contributions to restore public assets or provide new community experiences. This has been demonstrated in existing arrangements such as Sydney Zoo in Blacktown, sporting facilities like the Eastern Creek International Motorsports Park or entertainment facilities like the Hordern Pavilion. In addressing this balance, GSP notes that the Bill requires consultation with Community Trustee Boards around the planning for leasing and business opportunities and for commercial opportunities to be as set out in the plans of management and to meet the objects of the Bill.

Community engagement

GSP is deeply committed to community involvement and engagement in all its parks; however, under the current trusts' legislation, only CPMPT has a statutory requirement for a formal community consultation process, the Centennial Parklands Community Consultative Committee (CCC). All other existing trust legislation is silent on the issue.

We know we can do more for the Parklands estate by proactively engaging with Greater Sydney's communities, councils, state agencies, and industries. By listening to a diversity of local voices, First Nations communities, people from culturally and linguistically diverse backgrounds, people living with disability, older people, younger people, and families, we can better understand, respect, and embrace each park and its community.

The Bill's proposal for a community engagement framework is an opportunity to increase transparency and public certainty around consultation. GSP supports the framework provisions, noting it will have the same statutory weight as a plan of management and requires regular review to ensure it reflects current community standards.

The Bill's proposal for community trustee boards would allow GSPT to expand the formal consultation model across all GSP parks. In particular, GSP notes the Bill's provisions which set out the statutory requirement for membership to be inclusive and include First Nations representation, reflect community diversity, such as accessibility and heritage interests, and provide a role for local councils and input from local members. These provisions could provide GSPT with broad, informed and reliable community advice to influence the strategy and operation of our Parklands.

The Bill provisions also set out the range of issues the community trustee boards would provide advice on from a user perspective; park stewardship, usage, commercial activities, and environmental, heritage and cultural issues. GSPT would be obliged to consider the views of the community trustee boards, increasing the impact of the community boards' representation and ensuring that GSPT takes well informed action.

GSP supports these provisions, which go further than the existing CPMPT CCC provisions in ensuring diverse representation, broader input and an engagement framework across all GSP parks.

Expanding the Parklands Estate

GSP recognises that new parks will be required as Sydney's population grows and to create a 'city within a park' to further enhance the city's liveability.

The Bill provisions create a framework for the expansion of Parklands in Sydney. GSP notes that GSPT functions in the Bill include taking on new parks as they are established.

The Bill allows these new parks to be vested in the umbrella trust, without the need to transfer these to the existing park trusts – as was done in relation to Fernhill Estate and Callan Park – or the need to establish new park entities with a potentially siloed focus, diluted resources and lack of strategic oversight.

The Bill requires GSPT to investigate and report on new opportunities to expand the Parklands estate to increase Sydney's Green and Blue Grid and positively benefit the wider communities and people of Greater Sydney. This will meet the expectations of

our growing population in Greater Sydney in the future, to bring to life the NSW Government's 50-Year Vision for Open Space and Parklands, and ultimately create a 'city within a park'.

Financial sustainability

GSP recognises the community's concern regarding over-commercialisation of public Parklands, the importance of maintaining public access and value, and view of some parts of the community that parks should be funded solely by NSW Government grants.

GSP notes that the Bill provisions include a function for GSPT to create a sustainable financial model, however similar to the existing trusts' legislation, is not specific about which funding model or make any changes to the existing funding models that include a mix of government grants and self-generated revenues. This would allow GSPT to adapt to reflect the particular characteristics of any new parks it may own in future and recognises that a 'one size fits all' approach is not appropriate for existing trust parks or future parks.

GSP notes that any commercial activities should be in line with the parks' plans of management and GSPT is required to consult with the community trustee boards in both the preparation of plans of management and planning for new business initiatives.

We note that the Bill requires GSPT, when making spending decisions, to prioritise spending on the park where the funds were generated or where NSW Government grants were allocated, and that sufficient funding should be provided to implement the plan of management for each park. GSP considers that these arrangements could be effectively and transparently reported in annual reports.

It has been GSP's experience over the last 18 months, and as a result of previous administrative amalgamations of park management (such as combining WSPT and PPT administrations in 2012), that a combined administration produces operational savings that can be redirected back into park management, projects and services, and provides a better resourced, higher quality and more professional park management service for the community.

For example, in the last 12 months of interim arrangements:

- Savings of \$0.6M have been re-directed back into park management at Callan Park and WSP, and more savings will be generated as the arrangements mature;
- Back-of-house systems are being streamlined, allowing for more resources to be focussed on community facing activities; and
- Children's education and environmental programs have been extended over more GSP parks, benefiting more communities. Centennial Parklands' world-leading education team has provided expertise and resources to deliver a pop-up nature playground at Callan Park, for example.

GSP notes that in a separate process, the NSW Government is investigating funding mechanisms to put GSPT on the most sustainable footing for the future, with the aim to provide additional funding to the Parklands estate without increasing commercial activities in the parks.

For example, the establishment of off-park business hubs would generate revenues that could create significant new income streams for long-term protection and enhancement of the Parklands, without effecting ecological, historical or recreational values of parks. As well as ensuring financial sustainability and security for the Parklands estate, the leasing arrangements would serve the communities of Greater Sydney, create local jobs and drive innovation. Revenues generated from the business hubs would go straight back into the Parklands estate for ongoing maintenance and improvements.

Planning

GSP is committed to achieving the Blue Green Grid to ensure the long-term success of parklands and their ecological values across Sydney and notes the Bill provisions allow for GSPT to establish a Blue Green Grid Committee. In combination with the Bill's expanded objects and functions, this would allow GSPT to have a recognised role in advocating for the 50-Year Vision and the implementation of the Green and Blue Grid.

This role is not supported under the current trusts' legislation and there is no other government agency with an equivalent responsibility in Sydney. In this regard, GSP supports the Bill provisions and sees the potential for a vastly improved green space outcome for Sydney as the city grows over the next 50 years.

We also note that agencies such as the Greater Sydney Commission will need to consult with GSPT in planning for open space matters relating to the District and Regional plans. This is important to ensure that future planning of the Greater Sydney Region is in synergy with access to public spaces and the regional parklands.

GSP supports the Bill's provision to protect GSP parks from overshadowing from future adjacent development and the requirement for assessment agencies to consider a GSP Shadow Modelling Study when assessing development applications.

GSP works closely with all 10 of its touchpoint councils and notes that the Bill makes no changes to current council planning approval arrangements across all parks. Inner West Council approval arrangements for Callan Park are discussed below.

Callan Park amendments

GSP is focussed on the protection and restoration of Callan Park, specifically the 38ha for which it is responsible. GSP notes the Bill retains the protection from sale of any Callan Park land or commercialisation through hotels or function centres.

GSP's vision is to conserve and maintain the park's assets and to take a 50 year perspective on the park's future role as a key parkland for the Inner West community.

GSP notes the Bill provisions retain Inner West Council as the consent authority for works within Callan Park, and will allow the council to determine development applications under a current Local Environmental Plan (LEP), with amendments to include Callan Park, rather than under the 2001 LEP that council replaced in 2013.

GSP expects that this updating of the LEP arrangements will make development assessments quicker and more efficient for both council and GSPT, to accelerate the restoration of the park and its heritage buildings, implementation of the Landscape Structure Plan, and basic maintenance activities to protect and enhance the park. Working with Inner West Council, GSP estimates savings of around 50% in development application costs and significantly reduced assessment timeframes to make restoration works quicker and for savings to all go back into park management.

GSP recognises community concerns about lease lengths and potential privatisation of public assets, and that these concerns need to be balanced with tenure requirements to encourage private contributions to restoring those assets.

GSP is currently spending around \$2M to restore 3 existing buildings including the historic Bonnyview, in preparation of adaptive reuse by private community groups, and around \$1M to demolish 2 derelict buildings on the waterfront to allow for more recreational green space for the community. GSP anticipates that 10-years maximum lease lengths for these 3 currently restored buildings under the Bill provisions will allow for a positive business outcome for both GSPT and private tenants. For example, at World Heritage listed Parramatta Park a number of popular and viable tenancies such as disabled childcare and cafés operate on 10-year leases.

In relation to Kirkbride, Broughton Hall and the Convalescent Cottages, GSP understands that significant investment would be required to restore these buildings and that encouraging private investment to partially contribute to this cost will require longer leases than the 10 years proposed under the Bill for other buildings. GSP notes the Bill provision to allow 50-year maximum lease term for these key heritage buildings to attract private support while still retaining public ownership. GSP considers the restoration and adaptive reuse of these immensely valuable heritage buildings is a priority and critical for the wider Callan Park site to prosper.

To support GSP's public expression of interest for adaptive reuse of a restored building at Callan Park, we conducted a survey of community aspirations for activities and uses for Callan Park buildings (Draft results at **Attachment A**). In summary, around 70% of results supported a café on the site, 60 percentage arts and cultural facilities and activities, and 60% sports activities. GSP considers that the Bill provisions to permit food and beverage and arts and culture activities at Callan Park reflect community aspirations, are in line with other permissible uses at Callan Park and other major parks across Sydney, and could help to create an enlivened and well-loved future for the park. It is also in line with Inner West Council's Community Strategic Plan *Our Inner West 2036*, which includes "creative communities and a strong economy" as one of five strategic directions for the local government area.

The survey at **Attachment A** showed existing national examples that combine not-for-profit and standard businesses to create a lively and sustainable precinct, where

arts and cultural not-for-profit businesses attract visitors and standard businesses provide a sustainable management structure for the precinct and its not-for-profit tenants.

Based on these other national examples, GSP considers that this mixed model could create both a lively and sustainable precinct for the community, and make a useful contribution to restoring and maintaining the park's buildings to be retained and adaptively reused. **Attachment B** provides an indication of the condition of current buildings in the park to be restored and maintained or alternatively demolished.

GSP estimates that the current amendment to Bill provisions to require all activities other than arts and cultural events to be not-for-profit will reduce future adaptive reuse incomes and GSP's capacity to internally fund the restoration and maintenance of park assets by around 50%.

Attachments

Attachment A: Callan Park Survey Results

Attachment B: Callan Park Building Condition Report