



FRIENDS OF CALLAN PARK

PO Box 238

ROZELLE NSW 2039

www.callanpark.com

focp.admin@gmail.com

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WHITE PAPER – PARKLANDS FOR PEOPLE:

A PROPOSED LEGISLATIVE FRAMEWORK FOR GREATER SYDNEY PARKLANDS - May 2021

EXECUTIVE SUMMARY

Friends of Callan Park (FOCP) welcome the Minister for Planning and Public Places aspiration for a Sydney as a city of parks, his expressed commitment to associate the community with their management and his ambition for secure and increased funding for our parklands. However, we are disappointed in the blueprint for the future management of Sydney's iconic parklands, including Callan Park, as outlined in the White Paper 'Parklands for People'. It falls well short of the Minister's worthy objectives – particularly in regard to Callan Park.

We endorse the Inner West Council's response to the White Paper which was resolved at its meeting of 29 June 2021:

That Council make a submission in relation to the NSW Government White Paper – Parklands for the People noting that:

1. The NSW Government recognises the historical, cultural, environmental and recreational importance of Callan Park. It is the jewel of the inner west.
2. That the governance and management of Callan Park should be local and under one body, the Callan Park Trust.
3. That Council rejects the carve up of Callan Park into different precincts.
4. That Council rejects that a significant part of Callan Park has been handed over to the Greater Sydney Parklands.
5. That Council reiterates its strong and unwavering support for the Callan Park (Special Provisions) Act 2002 and for the establishment of the Callan Park Trust to manage and govern the whole of Callan Park.

Besides this response from Council, 1,126 people (including individuals in Victoria, Queensland, England, France and America) have signed Friends of Callan Park's petition stating:

We, the undersigned, advise you of our strong support for a Callan Park & Broughton Hall Trust to manage the whole of Callan Park as provided for in the Callan Park (Special Provisions) Act 2002. We believe the board of the Trust should combine expertise in park management, mental health and heritage with significant local and First Nations representation.

Friends of Callan Park (FOCP) welcome the opportunity to comment on the White Paper 'Parklands for People'. Our submission spells out our concerns and recommendations in detail. We also believe the points made are relevant to the other parks in the Greater Sydney Parklands' remit.

FRIENDS OF CALLAN PARK 1998 – 2021

22+ YEARS OF COMMUNITY ACTIVISM • ADVOCACY • ACHIEVEMENT

CALLAN PARK & BROUGHTON HALL :: LANDSCAPE @ RISK – AUSTRALIAN GARDEN HISTORY SOCIETY

It is FOCP's view that:

- The Board of the proposed Greater Sydney Parklands (GSP) has excessive powers and is unrepresentative of the wider Sydney community.
- The objectives of the GSP are too narrowly focused on revenue raising.
- The protections against sell-off and privatisation (including long-term leases) in the Callan Park (Special Provisions) Act 2002 should be extended to all parks in any future GSP legislation.
- The objectives of the GSP should be modified to emphasise a priority on the protection and improvement of the parks' ecological and heritage values as well as lobbying for secure funding from Treasury and coordinating the enhancement of our parklands.
- There is recognition in the White Paper that each of the parklands in the GSP portfolio is distinctive and that a one-size-fits-all management model is inadequate. This assertion should be reflected by a structure of management that recognises this, with a Trust for every significant parkland including strong and accountable local representation.
- Callan Park has defining features which make it distinctive and unique from other parklands and for this reason deserves its own dedicated Trust to manage the whole of the site.
- The Trust to manage Callan Park and Broughton Hall has been championed by the elected local Council for two decades and should include accountable local representatives, as well as First Nations and expert members.
- Local Trusts such as the Callan Park and Broughton Hall Trust (and the GSP itself) should operate with the maximum of transparency and opportunities for input from members of the local and wider Sydney community.
- Powerless advisory committees will not satisfy legitimate public concerns about effective protection of our parklands.

Friends of Callan Park are firmly of the view that only the recognition and incorporation of the above points in any future GSP legislation will meet the lofty ambitions of the Minister's introduction to the White Paper and the aspirations of the community regarding its parks.

INTRODUCTION

Extract from the White Paper – Minister's Vision

It is my vision, and that of the New South Wales government, for Greater Sydney to evolve as a city within a park... Any decision on the future of our parkland must be validated by the views of the community.

FOCP supports the Minister's vision of 'Parklands for People' and his recognition that 'the pandemic has emphasised the inherent need we have as humans for clean and safe public and open space'. We welcome the Minister's acknowledgement of Callan Park as an iconic parkland, the site of Sydney's first purpose-built asylum, with a 'significant history as a place for healing, respite and care'. [WP14]¹ As a place listed on the State Heritage Register, Callan Park with Broughton Hall has significance for the state – and indeed the nation.

¹ [WP] -- throughout this submission references page numbers in the White Paper

FOCP makes this submission on behalf of our members, local residents who use and treasure Callan Park, and all citizens who enjoy and value the open spaces in their parklands as places for recreation, exercise, quiet contemplation and as vital habitat for sustaining flora and fauna.

Our strong view is that parklands are a need, not a want. The physical and mental health benefits they provide to citizens cannot be overstated. The government has a responsibility to conserve, protect and enhance them, particularly as an antidote to the increasing impacts of climate change; and as an essential investment in public health.

Since 1998, FOCP have championed and safeguarded Callan Park, facing and defeating threats and challenges from state governments that would seek to divide, diminish, develop or commercialise the site. Callan Park and Broughton Hall, listed on the State Heritage Register, form a landscape of irreplaceable social, cultural and ecological value to the whole community. Our work – community activism, advocacy and achievement – continues with unabated commitment and passion. We trust this submission will be carefully considered by the Minister.

The Friends recognise and respect the importance of Country to First Nations people and acknowledge that Callan Park sits on the land of the Wangal and Gadigal people of the Eora nation. Once the government destroys evidence of Aboriginal habitation at Yurulbin Point in Balmain with the western harbour tunnel infrastructure, the midden that is essentially Callan Point will become the only evidence of Aboriginal habitation on the southern side of Sydney Harbour, making Callan Park and Callan Point a place of particular significance to Indigenous communities.

CONTEXT

It is FOCP's view that the five iconic parklands currently within the Greater Sydney Parklands (GSP) remit deserve much better treatment as the 'foundation stones' for the Minister's 50-year vision of 'Parklands for People'. Our concern is that there appears to be a fundamental lack of understanding or acknowledgement in this White Paper that these parklands - the cornerstone properties of the GSP - require investment, enhancement and protection as a **first priority for the GSP and the Trusts**.

Friends of Callan Park reject the proposed loose legislative framework contained in the White Paper - it offers insufficient detail regarding protection, safeguarding and enhancement of these parks as the last remaining great open public spaces in Greater Sydney.

Although the White Paper acknowledges community objection to a 'one size fits all' approach to the management of significant parklands – bearing in mind the discrete and unique aspects of the parklands that need to be sensitively and carefully managed – we believe the GSP White Paper proposes just such an approach.

The Draft Exposure Bill will need to have far more substance and specificity to satisfy the community and the parliament that any proposed legislative change will provide a secure and vibrant future for the foundation parklands and any parklands subsequently created.

We make the following comments regarding the impact of the GSP on Callan Park – current and proposed.

GREATER SYDNEY PARKLANDS AGENCY (GSP) AND PARKLANDS FOR PEOPLE WHITE PAPER

GOVERNMENTS CHANGE, MINISTERS CHANGE - THE GSP DOES NOT PROVIDE CERTAINTY FOR OUR ICONIC PARKLANDS

FOCP is concerned that in the White Paper, the GSP - an administrative agency - is proposed to be elevated to an 'Umbrella Trust', putting the community at arm's length from high-level and crucial decisions regarding the five foundation parklands. There is potential for the GSP structure to water down the Minister's aspirations and the realisation of his Vision in pursuit of revenue. Additionally, we have no confidence that any future Minister for Planning and Public Spaces will be driven by the same ambitious rhetoric of 'Parklands for People'.

The Legislation must be robust enough to protect each individual iconic foundation parkland from any future potential for sale either in part or whole. This protection is one of the foundations of the Callan Park (Special Provisions) Act 2002 (Item 5 - *Callan Park not to be sold or otherwise disposed of*). We appreciate that the Minister has identified that '**There is no standard prohibition on the sale of parkland**' [WP8] that applies across the five foundation parkland properties.

It is a principal and fundamental requirement that any draft legislation provides for that prohibition and does not allow for 'Ministerial discretion' which would deviate from that commitment.

THE 'SECRET' VESTING OF THE ANNEXED LAND INTO THE CENTENNIAL PARK AND MOORE PARK TRUST DOES NOT INSTIL COMMUNITY CONFIDENCE IN THE GSP BOARD

FOCP remains vehemently opposed to the fragmentation of Callan Park, brought about by the vesting of 62% in the Centennial Park and Moore Park Trust – effectively the GSP. FOCP is disheartened that this decision was made and actioned without any consultation with the community or even Inner West Council (the Consent Authority for Callan Park) at a time that appeared to be characterised by good communications with GSP and ministerial staff.

FOCP recognises that the government has fulfilled its legal obligation to inform the public by publishing the Proclamation in the Government Gazette but there remains the absence of conversations and transparency which the community expects of government. Although FOCP has been advised this step was taken to allow the GSP to 'manage' the annexed lands and apply regulations at Callan Park, FOCP does not accept that this vesting was necessary. The Callan Park (Special Provisions) Act 2002 allows for regulations to be created.

THE CREATION OF THE GSP HAS FRAGMENTED MANAGEMENT OF THE CALLAN PARK AND BROUGHTON HALL PARKLANDS – THIS NEEDS TO BE REMEDIED

We are disappointed that views and suggestions FOCP expressed in our submission to the Draft 50-year Vision (and other consultation processes) have been ignored, in particular our call for holistic management of the site and an independent Trust to manage it.

For decades, the 'handballing' of responsibility for care, control and management of Callan Park between NSW Health, SHFA, Office of Environment and Heritage, Department of Planning Industry and Environment, and now GSP - and Ministers - has perpetuated an absence of clarity and responsibility around decision-making, and created barriers for the proper management of Callan Park. The community now fears this annexation by the GSP has the potential to further exacerbate that situation.

FOCP – with the community – is concerned about the holistic management of Callan Park and Broughton Hall. Whilst the Memorandum of Understanding for the Management of Callan Park (signed 1 March 2021) between Health Administration Corporation and Centennial Park and Moore Park Trust describes the role of a Project Control Group there is nothing in this document which describes how the public will have one point of contact for the multitude of diverse issues which arise for users of Callan Park – some of which may be urgent. Holistic management and planning and a central ‘on the ground’ decision making capacity are essential to ensure effective and safe management of Callan Park and Broughton Hall across multiple precincts.

THERE MUST BE NO CHANGES TO THE CALLAN PARK (SPECIAL PROVISIONS) ACT 2002

Callan Park has unique protections under the Callan Park (Special Provisions) Act 2002. FOCP have been assured that the Minister intends to respect and uphold that Act and does not propose any changes to it.

The provisions and autonomy of the Callan Park (Special Provisions) Act 2002 must not be compromised or undermined in the Exposure Draft of the legislation. In fact, the Act’s provision for a Trust to manage the site should be activated.

WE REJECT THE SELF-FUNDING MODEL WHICH COULD LEAD TO OVER-COMMERCIALISATION OF THE FOUNDATION PARKLANDS

During a meeting with Minister Stokes, his Senior Advisor, Estelle Grech, and GSP Chief Executive, Suellen Fitzgerald, with representatives of other parklands on 28 April 2021, we provided a *Statement of the Guiding Principles* for the Alliance for Public Parklands (of which FOCP is a member). (Appendix 1)

At that meeting, Minister Stokes commented that he agreed with all principles expressed in that document (except Point 2 regarding separate boards and management) **including point 4** i.e.

Government has funding obligations. Like funding for essential public services and facilities such as health, education and sport, major parklands are also essential to public health and should be funded accordingly. Also, self-funding models may encourage inappropriate land uses, diminishing green and open spaces. Board focus on self-generated funding will detract from its main purpose of providing parks for the people.

The Minister told us that one of his principal reasons for the creation of the GSP is to get parks ‘a place higher up the list’ with Treasury. All of government including Treasury needs to be cognisant of the importance of public health and prioritise funding for parklands – open, green, passive recreation spaces available to the whole community – in the same way that government prioritises and provides extensive funding for organised sport and playing fields for all ages.

To date the only injections of funding of any public uses of open space at Callan Park have been solely for sports fields and the former Veterans’ Recreation Hall (504) - used for storage of sporting equipment and refugee services.

Few studies internationally have compared the different uses of parklands by different age groups. There has been a growth in the numbers of young people though the community as a whole is aging. User age is an important consideration for the ways in which parks are used, for example, the provision of seating as well as play areas. Green spaces are important for the healthy aging of our older citizens.²

² Sundevall EP, and Jansson M, Inclusive Parks across Ages: Multifunction and Urban Open Space Management for Children, Adolescents, and the Elderly, *International Journal of Environmental Research and Public Health*, 2020, 17, 9357

FOCP notes the government's recent commitment to contribute to funding \$200-300 million for a new sporting complex at Penrith that caters to a special-interest group, which has vastly greater resources to 'self-fund'. Parklands are a public need, not a want; they cater for all people of all ages and abilities and **the NSW government must shoulder funding responsibility that will benefit a far bigger voter contingent and have far greater benefits to the environment and society generally.**

FOCP understand that the Minister's intention is for the GSP to generate funding streams in order for the 'Parklands Estate' to be managed and increased. This ensures that Board members will be focused on a financial imperative to drive acquisitions. **We need an assurance that none of the five foundation parklands will be used as 'cash cows' (by way of sell-off, commercialisation, or any lease which diminishes the natural and ecological value of public open green or significant heritage spaces).**

FOCP is extremely concerned that the GSP Board will allow long leases which effectively privatise public lands and buildings and quarantine them from public use. Any such 'lazy' management schemes should be prevented by the draft Exposure legislation. The Callan Park (Special Provisions) Act 2002 requires that any leases in excess of 10 years need to lay on the table of both houses of the NSW Parliament for 15 sitting days and that either house can disallow a lease. Leases at other foundation parklands need to be subject to limits so as not to allow for 'privatisation by another name'.

The legislation should include protection from unsolicited proposals (whether commercial or not for profit) that could circumvent input from the Minister, the GSP, Parliament, individual Trusts and the community.

The 2021 Discussion paper refers repeatedly to the iconic stature of these parks in Sydney but like all public open green parklands they need proper government funding as part of a suite of public health services to become and maintain that much cited "iconic" status. Demonstrating national funding for parklands, in 2020 the US Congress signed into law the *Great American Outdoors Act* which will address priority repair needs in national parks and permanently fund that nation's Land and Water Conservation Fund.³

The community's explicit response to the 'value' of parklands was replicated in *A 50 Year Vision for Greater Sydney's Open Space and Parklands*, 2021 Discussion Paper, and echoed by many members of the public:

Our city's parks and gardens are among Sydney's greatest assets and a resource that belongs to and benefits the entire community'.⁴

Public Parklands should not be subject to expressions of interest from private developers with profit, not the public good, in mind. We do not want to see another backroom 'Barrangaroo' deal.

THE GSP BOARD'S STRATEGIC FOCUS IS LAND ACQUISITION AND REVENUE GENERATION, NOT PROTECTION AND ENHANCEMENT OF PARKS

The **powers of the GSP Board will be broad, but their responsibilities will be narrow** under the Minister's proposed legislation. FOCP is alarmed that the GSP Agency was created without consultation, and that the White Paper focuses on an over-arching strategic emphasis on land acquisition and revenue generation. Whether future land acquisitions are for additional public open space or repurposing of land 'surplus to government needs' (business parks to generate revenue), the **focus is clearly not on protection, enhancement and management of parklands.**

³ www.pewtrusts.org/en/about/news-room/press-releases-and-statements/2020/08/04/pew-joins-national-organizations-in-praising-enactment-of-great-american-outdoors-act

⁴ Updated 50 Year Vision 2021, p 22

There are critical missing themes in this White Paper, omitting the imperatives that must drive the GSP and its Board. Those themes are:

- Open Space: Protection and enhancement of open space (passive recreation space)
- Heritage: Expert conservation and restoration of built, natural and cultural assets
- Biodiversity and Ecology: Scientific preservation, conservation and restoration of biodiversity, ecological and wildlife habitats and landscapes within the parklands

A lack of focus by the GSP Board on these three crucial aspects will result in further degradation and encroachments across all the parklands. FOCP is concerned that there is a lack of evidence in the White Paper that would indicate that a focus on these themes will be enshrined in the legislation. **There is a complete absence of experts on the current Board to manage these aspects** which are fundamental to best practice parklands management and the success of the Minister's GSP aspirations.

This is evident when one examines the makeup of the Board of the GSP. Investigative journalist, Wendy Bacon, reporting on the GSP said, 'Of the 7 directors, 6 have property development experience – two have worked in Sydney's top corporate law firms.'⁵

As well as the GSP board's role and responsibilities, its composition needs to change to include people chosen for these specific skill sets (Public Open Space, Heritage and Biodiversity management) so that the community will have confidence they can provide a balance of views when competing funding and management priorities are being considered. At the local level too, the expertise of local communities needs to be part of the Trust management structure of each distinctive park.

We make the following comments on the four themes identified in the White Paper, as well as the three 'missing' themes.

GSP BOARD RESPONSIBILITIES AND PRIORITIES MUST ENCOMPASS SEVEN, NOT FOUR THEMES (OBJECTS)

We make these comments specific to Callan Park, aware that community advocates for the other four foundation parklands have equally urgent and unique issues of concern in these focus areas.

1 HERITAGE CONSERVATION

David Malouf, presenting the National Trust Heritage Lecture in 2000, succinctly described heritage as a term for what the community (and the nation) holds in common and in trust for those who come after – a body of shared possessions (land in various forms, the environment and nature, as well as buildings). Some may be in public and private ownership, yet the community has an interest in and a right in these possessions which overrides the rights and interests of their legal possessors.

BUILT HERITAGE

FOCP appreciates Minister Stokes' commitment of \$14.5 million for landscape works at Callan Park, however, the lack of government's responsible custodianship of this remarkable landscape and its buildings demands that further investment is made by the GSP to restore, repurpose and adaptively reuse the many heritage buildings at Callan Park which have fallen into decay. FOCP recognises that the Minister is aware of this historic neglect which was reflected in his promise that this initial funding was, in his words, 'a down payment'.

⁵ Wendy Bacon, Forum, Parliament House, 17 February 2021

Listed as an Endangered Place by the National Trust in 1999, Callan Park has also been identified by the Australian Garden History Society as a *Landscape at Risk*. Decades of neglect at Callan Park by successive governments have manifestly contributed to its continued decline - dozens of buildings are slated for demolition with no examination of their history or potential for adaptive reuse, as recommended in the Burra Charter. Detailed conservation policies of the Callan Park Conservation Management Plan 2002 are ignored by site owners, managers and tenants, and oversight and holistic management of the entire site has been absent for decades.

This is not good enough for Callan Park. Expedient 'solutions' should not prevail.

CULTURAL HERITAGE – INCLUDING MENTAL HEALTH

The demolition plans for Callan Park include buildings used for more than a century for care and treatment of people experiencing mental illness. This historical context of Callan Park, as a place of asylum and respite is recognised (as we have acknowledged) by the Minister in the Updated 50 Year Vision paper: Callan Park has a 'significant history as a place for healing, respite and care' [WP 14].

FOCP have continually recognised and celebrated the heritage of this remarkable cultural landscape. At every meeting, members remind us all that Callan Park's heritage and history is a crucial and central requirement to any future proposals for the site and its care and management. Members also urge FOCP to continue to advocate for the establishment of modern, voluntary mental health services at Callan Park. FOCP's submission to the 50 Year Vision consultation paper makes explicit our commitment to that priority and refutes any suggestion by consultants that this is "no longer a priority for our members or the broader community".⁶

Every petition and survey undertaken in the last three decades indicates overwhelming support for a new model of mental health services at Callan Park. On Thursday 21 June 2018 Jamie Parker, Member of Parliament for Port Jackson, held a public meeting in Balmain Town Hall to endeavour to allay concerns about the Draft Landscape Structure Plan and inform the wider public about its implications for Callan Park. Before the presentation by DPIE staff commenced, Jamie Parker read a message from the NSW Department of Health. He said:

I want to give you an update and inform people that we are making ... progress on the mental health front. As people know, I believe the moral heartland of Callan Park is mental health service provision and I am delighted that today the Department of Health have indicated that they are looking to work with this community and in a statement which I have they said that: "Sydney Local Health District will liaise with the community on opportunities for step down mental health service provision at Callan Park." And that, friends, is really a fantastic breakthrough. We now have an opportunity to talk with the Department of Health about mental health – about step down mental health facilities ... (and) the range of services that can be used at Callan Park. So that, in my book, is a really positive step forward.

It is inarguable that community mental health services are woefully inadequate in NSW (and the nation) as documented by multiple government enquiries over past decades. The annexation by the GSP of the whole of the foreshore and central grounds of Callan Park does not absolve the Board (and the Minister) of responsibilities to listen and respond to the community on this aspect in particular.

There is a unique opportunity at Callan Park for buildings to be adapted and repurposed to provide (for example) step-down services for people transiting out of acute care settings and/or for other psychosocial services and/or vocational training settings, such as not for profit cafes or art studios for people experiencing isolation and episodic mental ill-health. These activities are all permissible under the Callan Park (Special Provisions) Act 2002.

Indeed, 'Mental health IS the moral heart of Callan Park' and FOCP will continue to advocate for the community to ensure this important priority remains on the GSP's agenda.

⁶ Landscape Structure Plan, July 2020, p16

LANDSCAPE HERITAGE

Callan Park has more tree species than New York's Central Park. Just like Sydney's Botanic Gardens, it provides an irreplaceable landscape, with gardens designed by Charles Moore and intended for therapy, reflection and respite. Protections for unique (and common) tree and plant species need to be put in place by the GSP as a matter of urgency, to avoid delinquent felling of trees (as occurred in February by Inner West Council on an area it holds under licence). This vandalism occurred under the GSP's 'watch' and broad responsibility must be taken for fundamental needs of park management and regulations at an iconic and significant place such as Callan Park. There is a long-overdue need to make explicit the responsibilities of all tenants and licence holders and regular meetings to educate and prevent any future re-occurrences of this nature.

2 PUBLIC OPEN SPACE

The Inner West Council LGA, within which Callan Park sits, has the third lowest open space ratio of the 130 Councils in NSW.

The phrase 'open space' has been used 150 times in the Updated 50 Year Vision.

We note this definition included in the Vision document (page 11):

... defining open space and parklands

When we talk about open space and parklands, we mean everything from national, regional and local parks; to the harbour, beaches, wetlands, creeks and rivers; to playgrounds, playing fields, golf courses and even cemeteries. We also mean the links between these open spaces – including biodiversity corridors and green parkways, transport routes, streets, and walking and cycle paths.

Government Architect NSW. 2018. Sydney Green Grid.

In the *Updated 50 Year Vision paper*, responses from 7,000 people who participated in the Greater Sydney Outdoor Study were quoted (page 14/15). **We do not believe that any of those respondents would have had playing fields, golf courses and cemeteries in mind when thinking about 'open space'.**

It is clear that the respondents to the *50 Year Vision* consultation had a conventional (and straightforward) view of what constitutes open space. That is, space which is not built on nor quarantined or reserved for specific use by particular single-interest groups at particular times: land that is free for the whole public to use for passive and active (but unstructured) recreation at times of their own choosing.

Some key findings from that survey were:

- 77% of people love relaxing in open spaces
- 75% of Sydneysiders rate 'landscape and natural environment' as a top priority
- 85% of people love walking, hiking, jogging or relaxing
- 70% of people consider open space an important factor in their lives

And in response to 'What's Important':

1. Personal journey: people enjoy experiences that involve walking, visiting destinations, exercising and exploring
2. Personal choice: people like spaces that provide flexibility and don't require a membership or schedule
3. Diverse expression: people like spaces that provide opportunities for a variety of recreation activities
4. Inclusive recreation: access for everyone – regardless of their age, culture or ability – is fundamental

There should be no doubt by the Minister or the GSP Board about what ‘open space’ means to the community, and no prevarication in consultation or conversations with the public. No ‘transport routes’ must impinge on these public open spaces and parklands. ‘Activation’ in the pursuit of revenue must not compromise or diminish these values. ‘Open Space’ is the essence and the value of ‘parklands for people’ who want to use their parks for passive recreation at times of their own choosing.

3 BIODIVERSITY AND ECOLOGY

As previously mentioned, Callan Park has more tree species than New York’s Central Park and gardens and landscapes meticulously planned and curated over a century ago. These gardens, landscapes, plantings and remnants of native bushland provide essential habitat for insects, reptiles, animals and birds in one of the most densely populated areas of Greater Sydney. The flora and trees – many of them significant and rare – at Callan Park must be protected and expertly conserved.

It should not be left to ‘landscape design consultants’ to choose ‘fashionable’ plantings at Callan Park. The GSP has a responsibility to continue to enhance, conserve and respect Callan Park’s important heritage landscapes and proper planning should be done to ensure the process is disciplined and comes from an educated and sensitive perspective.

It is extremely disappointing to FOCP that there is no one on the current Board of the GSP that has been recruited for their scientific expertise in this aspect of parklands management and enhancement, particularly in the context of climate change and its expected impacts on our cities and populations – human and animal. Such expertise would ensure that proper conservation practices are followed and that any new plantings are compatible with existing landscapes, enhance habitat and duly focus on sustainability within the context of an increasingly warming environment. Shade trees that are drought-tolerant and native to the parklands and the state should be prioritised in the case of any replacement or additional plantings. As well as providing essential habitat, the gardens and swathes of trees at Callan Park are of intrinsic and immeasurable value, enhancing park users’ experience and enjoyment.

As we have said, this ‘missing’ theme from the White Paper and the makeup of the GSP Board should be rectified as a key priority across the five foundation parklands (and any subsequent parklands managed by the GSP).

4 FUNDING

The White Paper provides no financial plan or business case for the GSP: there is a dearth of information indicating how care, enhancement and maintenance of parks will be funded. This exacerbates existing fears about the potential for the GSP to allow commercialisation or long leases which amount to effective privatisation of these parklands (or parts of them). Although there is mention of \$108 million being ‘invested’ in the GSP [WP 11] there is no information about how these monies have been allocated or spent or how the existing parklands have benefited. FOCP is alarmed by the statement *‘However, this investment must be **matched** (our emphasis) with the development of an ongoing, sustainable funding model for the future’*, since no such model is articulated in any detail in the White Paper.

There is also mention about the preferred option for the new legislation framework which refers to *‘...more contemporary financial structures’*. [WP 16] And reference to *‘a contemporary and enduring financial operating model that enables the GSP Trust to manage parks and deliver new parks...’* [WP 19] is accompanied by no information about what these ‘structures’ might be.

The White Paper mentions, *'Each existing park trust has different constraints and opportunities for creating sustainable funding streams and different funding solutions are required'* [WP 25]. This reinforces our view that a 'one size fits all' funding model (or structure) will not serve the interests of the individual parks and should not be pursued. It also reinforces the oft-repeated government mantra that 'parks must pay for themselves', a view with which we vehemently disagree.

A note on Off-Park business hubs– the only specific funding idea in the White Paper [WP 26]

There is a description of a 'new idea' modelled on the Western Sydney Parklands financial model, as an exemplar which has *'successfully created a sustainable revenue base...'* and could potentially be applied to the GSP funding model, that is, by creating 'off park' business hubs to *'become the funding engine for all of the parklands'*.

Yet, the Western Sydney Parklands **legislation is not a suitable model** because *'it has been designed for a unique parklands corridor specific to its size and location with some features that are unlike other parks'* [WP 17]. The Western Sydney Parklands funding model is not suitable for any of the other historic parklands since the business parks it refers to are on-site. Parkland users familiar with the Western Sydney Parklands model would not necessarily agree that the business hubs on that site are on land that is of *'low environmental and recreational value'* and FOCP believes that assessments for future business hub sites would or could be equally subjective and not subject to community opinion or objection. This model is not permissible under the Callan Park (Special Provisions) Act 2002.

Should this model be adopted, FOCP rejects any potential for the redesignation of the 23 hectares remaining in Callan Park and Broughton Hall and not included within the GSP as 'surplus government-owned land that is not suitable to be used as parkland', and subsequently transferred to the GSP Trust for the creation of 'off-park' business hubs.

Government funding of parks and open green space is a proven strategy that not only increases places for active and passive physical activity but reduces the risk of long term health issues related to obesity, physical inactivity and mental health.⁷

5 GOVERNANCE

FOCP believes that the Governance detail in the White Paper, whilst acknowledging concerns expressed in the 50 Year Vision consultation process, does not provide sufficient detail which would allay those concerns. *'The community loves their parks and wants to play a role in shaping and supporting realisation of the vision through future engagement that recognises local and diverse voices'*. [WP 19]

Community Consultation, addressed as a separate focus area in the White Paper, should be inextricable from the governance of these parklands. Our position is that genuine community engagement with the management processes of these parks is essential. The community consultative committee model at Centennial Park does not fit with the GSP- members are appointed and can be dismissed by the Centennial and Moore Park Trust board which also controls the committee's agenda.

Since 62% of Callan Park is now vested in Centennial Park – there has been no information provided to the community about how two geographically separate communities will have proper representation and input into individual community consultative committees for these two iconic, discrete and significant landscapes.

⁷ E. Yañez & W Muzzy, *Healthy Parks, Healthy Communities*, Policy Brief, The Trust for Public Lands, San Francisco, October 2005, p1

6 PLANNING

FOCP accepts the Minister's rationale that a 'voice for parks in city-wide planning processes' [WP28] and '...a legislated role in city-wide planning processes', is required, particularly if the GSP has the authority to ensure that Treasury accepts that funding for parklands is essential.

FOCP appreciates that the Minister has created a dialogue around the essential nature of parklands to the fabric of Greater Sydney and elevated the notion of 'green infrastructure' as important to the city and the State as (for example) transport and sport infrastructure. FOCP's concern is to ensure that any new legislation enacted by the Minister enshrines that philosophy and 'future-proofs' parklands and open space against sale, commercialisation and/or development in perpetuity. FOCP believes that such a parklands-wide agency will be a more effective voice for parklands if the community is actively involved in its structure and can rally public opinion in support of its objectives.

7 COMMUNITY CONSULTATION

FOCP believes that any legislation which relegates the proposed Community Trust Boards to an 'advisory' capacity only, will render those Boards toothless. The current proposed model - top-down management of parks by the GSP Board - is unacceptable because it effectively removes the community 'voice' (and knowledge, expertise and initiatives) from decision-making.

FOCP proposes a revised, more democratic, bottom-up model, which will ensure that local voices, people who use, love and value the parklands they visit, will be heard. This is a practical statement that locals to any place have a deeper knowledge of that place than others who are not regular users. For example, residents of Inner West Council LGA have a greater 'local' knowledge of Callan Park than they do of Parramatta Park. At the same time, the managing Trusts for each parkland must operate in a manner that allows any citizen to have a voice in decisions.

We are encouraged by the Minister's words in the White Paper: 'Any decision on the future of our parkland must be validated by the views of the community. They are the park users and the park experts. Their voice gives meaning to what we are trying to do.' [WP 5]

Those words exemplify the significant role the community has always played in each of these great parklands and appear to FOCP to indicate implicitly that citizens should be involved in actual decision-making in the management of their parks. FOCP has always recognised that users of Callan Park (whether local residents or visitors from across the state) care passionately about its preservation, protection and improvement. Many people who have the luxury of living nearby are deeply familiar with Callan Park.

For decades the community has acted as Callan Park's ultimate custodians and its champions. They have done this on an ad hoc basis but now is the time and opportunity to give that local custodianship and expertise institutional form in a Callan Park and Broughton Hall Trust with strong local and accountable representation.

... **CONCLUSION** **overleaf**

CONCLUSION

THE DRAFT EXPOSURE LEGISLATION MUST ADDRESS THESE SPECIFICS:

1. Any legislation enacted to govern the workings, aims and objects of the GSP and/or GSP Trust must ensure it will be charged with providing protection and public ownership, in perpetuity, of all the lands within all of the properties currently within its portfolio.
2. By protection, we mean a guarantee of retention of all the lands currently vested in the Trust, without the possibility of any sell-offs or divestment of all or parts of the lands within the five parklands.
3. The granting of new, major leases that will effectively 'hand over', alienate or privatise the lands and heritage assets within those parklands should not be permissible within the legislation.
4. Legislation must embed provisions for an independent governance entity for each of the parklands and a requirement for the GSP to consult each of those governance entities regarding strategies, plans and actions affecting each specific parkland.
5. Legislation must embed a requirement for the GSP Trust Board to be transparent in its management of the parklands. That is, to make its Terms of Reference; Minutes of Meetings; Constitution and Annual Reports publicly available and accessible.
6. Legislation must embed dedicated community representation.
7. Legislation must embed adequate environmental protections.
8. Legislation must embed recurrent funding.

Friends of Callan Park are willing and prepared to work with the Minister to assist in bringing his laudable vision to fruition, providing our concerns expressed in this document are addressed.

We welcome the opportunity to provide this submission to the White Paper and look forward to a constructive relationship with the Minister and the GSP moving forward.

FRIENDS OF CALLAN PARK 1998 – 2021

22+ YEARS OF COMMUNITY ACTIVISM • ADVOCACY • ACHIEVEMENT

CALLAN PARK & BROUGHTON HALL :: LANDSCAPE @ RISK – AUSTRALIAN GARDEN HISTORY SOCIETY

GREATER SYDNEY PARKLAND ALLIANCE
Guiding Principles
25 April 2021

The GSP Alliance is a coalition representing the interests of all 5 iconic parklands currently within the scope of the new Greater Sydney Parklands (GSP) agency.¹ We welcome the opportunity of meeting with Minister Stokes to discuss the GSP in line with community concerns to protect and safeguard what remains of our parklands for present and future generations.

Genuine community engagement, respect for biodiversity and heritage and a desire to restore the natural environment sit at the heart of our efforts. This statement of principles, including our concerns, are the result of extensive meetings and discussion between members of the Alliance.

1. **Restoring trust.** The approach taken by the government in the way that it created the GSP is harming public trust. A full and broad public consultation process on the future of our iconic parks should be undertaken to restore public trust.
2. **A separate board and separate management are required for each statutory park trust.** A “one size fits all” approach to managing these five great parklands is unworkable. Each park has its own unique site-specific challenges and management issues.
3. **Any prospective legislation should protect against “inappropriate development and sell-off”.** Lands should remain vested in their respective Trust. Privatisation by way of long leases should be prohibited. Uses that exclude or alienate general public access should be discouraged.
4. **Government has funding obligations.** Like funding for essential public services and facilities such as health, education and sport, major parklands are also essential to public health and should be funded accordingly. Also, self-funding models may encourage inappropriate land uses, diminishing green and open spaces. Board focus on self-generated funding will detract from its main purpose of providing parks for the people.²
5. **Trusts must be accountable to the community and Trustees should have relevant skills.** Boards should have a range of skills including parkland management, cultural landscapes, biodiversity, ecology and heritage. First Nations must be represented. Each parkland should draw upon the expertise of other relevant agencies (Heritage NSW, National Trust, NPWS, Sydney Harbour Federation Trust, etc.). The Boards should be balanced, fearless and free of conflicts of interest.
6. **Genuine community representation and diversity must be built-in.** There needs to be genuine community participation through representation on Boards or Advisory Committees. Publications, especially Minutes of board meetings, must be provided in a timely fashion. Board meetings should be open to the public.
7. **There must be an explicit commitment to heritage protection in all of the parklands.** Any legislation must commit to the conservation, protection and interpretation of natural and cultural values. New hardscaping which could negatively impact values should be avoided.
8. **Biodiversity, ecological and wildlife habitats must be protected.** It is no secret that, as a nation, we are failing to protect biodiversity. This is a key concern of the Australian public, particularly in the wake of last year’s devastating bushfires. In Sydney, our fauna and flora are rapidly diminishing, especially on the Cumberland Plain. Conservation of these precious resources is imperative, and the parklands provide crucial zones for natural habitat.

¹ GSP Alliance members include Friends of Callan Park, the Centennial Park Community Consultative Committee & Centennial Park Residents’ Association, Cumberland Bird Observers and Cumberland Landcare Group, Friends of Fernhill and Mulgoa Valley (FFMV), North Parramatta Residents’ Action Group as well as other public parklands advocates.

² Self-funding has been, in the past, not workable for the Sydney Harbour Federation Trust, and led to community upset and a court action.