

**Submission
No 1**

REVIEW OF THE GREATER SYDNEY PARKLANDS TRUST ACT 2022

Name: Mr Douglas Belton

Date Received: 6 November 2024

My response to the question of "whether the policy objectives of the GSPT Act remain valid, and the terms of the Act remain appropriate for securing those objectives" are as follows:

The GSPT Act is partially valid; the terms of the Act require amendment to secure the effect of objectives (f) and (g).

The current terms are deficient for securing the objects below:

(f) to ensure the parklands estate may be used by the community in a way that is adaptive and recognises and responds to the diverse needs of the community,

(g) to provide increased opportunity for community engagement to shape regionally significant parklands in response to diverse community needs.

To better secure the objects of (f) and (g), the language in **15 Functions - generally** should be amended as per below:

15 Functions—generally

(1) The Trust has the following functions—

...

(c) to facilitate and promote the use of the parklands estate for education, environmental sustainability, and scientific and other research, including by providing facilities for education, **community-led sustainable development**, and research,

(d) to encourage and promote appropriate public access, **community benefit**, and enjoyment of the parklands estate, including by catering to a diverse range of **community interests, organisations and activities**,

(e) to provide for and facilitate a diverse range of recreational, **therapeutic**, historical, educational, **agricultural**, environmental, cultural, sporting, entertainment and tourism uses of the parklands estate, including by providing facilities, **worker accommodation**, and associated services,

(f) to facilitate the use of the parklands estate to meet community health needs and provide opportunities for, and encourage, activities that promote health **and nutrition**, and well-being in the community,

(g) to consult with, and ~~involve~~ **collaborate with**, the community in planning for the parklands estate and carrying out the plans, including the provision of services and facilities within the parklands estate, by establishing a ~~transparent~~ **collaborative** process for consultation about and management of the parklands estate,

(h) to ~~consult~~ **engage in collaborative decision-making** with community trustee boards about any advice received from the boards about the parklands estate or parts of the parklands estate,

...

(l) to undertake or facilitate business activities and the provision of facilities within the GSPT estate, but only for the following purposes—

(i) to maintain and improve the parklands estate across Greater Sydney,

(ii) to ensure the parklands estate is effectively managed and operated to deliver high quality, **socially equitable**, and ecologically sustainable parklands for the public,

(m) to provide or permit **the private, and civil sector** provision of food and other refreshments on land within the GSPT estate **through innovative and collaborative partnerships that prioritise public benefit**,

...

To improve the capacity of the trustee board to "provide increased opportunity for community engagement to shape regionally significant parklands in response to diverse community needs" Part 2 Constitution and procedure of community trustee boards should be amended as per below:

Part 2 Constitution

...

3 Part-time appointments

Members hold office as part-time, **independent** members ~~on a voluntary basis and are not entitled to remuneration~~ **entitled to be paid the remuneration, including travelling and subsistence allowances, as the Minister may from time to time decide for the member.**

The term below in 17(2)(a) "have **regard** to..." is not appropriate for securing the object of "increased opportunity for community engagement to shape regionally significant parklands in response to diverse community needs". This language of this term should be amended to **"engage in a collaborative decision-making process that incorporates the views of a community trustee board for the relevant parkland..."**

The term in 17(2)(b) "...obtain the community trustee board's **agreement** to the plan of management..." also is not appropriate for securing the object of "increased opportunity for community engagement to shape regionally significant parklands in response to diverse community needs". The language of this term should be amended to **"obtain the community trustee board's [collaborative input] and agreement to the plan of management..."**. To my knowledge the Plan of Management has already been published without the community trustee board's agreement.

17 Exercise of functions in conjunction with community trustee boards

...

(2) The Trust must—

(a) **have regard** to the views of a community trustee board for the relevant parkland,
and

(b) for a plan of management—**obtain the community trustee board's agreement to the plan of management** before submitting the plan to the Minister.

The term below in 31(1)(a) "how the Trust will **consult and engage** with the community and relevant stakeholders" is not appropriate for securing the objects of (f) "to ensure the parklands estate may be used by the community in a way that is adaptive and recognises and responds to the diverse needs of the community, nor for object (g) "to provide increased opportunity for community engagement to shape regionally significant parklands in response to diverse community needs" The language in this term should be amended to "how the Trust will **consult [and collaborate]** with the community and relevant stakeholders..."

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(1) The consultation and engagement framework must include the following—

(a) how the Trust will **consult and collaborate** with the community and relevant stakeholders about the parklands estate and particular parks,

Attachment A

Douglas William Belton II
Acting Chair, Western Sydney Parklands Community Trustee Board

04 July 2024

Board of Directors
Greater Sydney Parklands Trust

Dear Members of the Greater Sydney Parklands Trust Board,

Subject: Recommendations for Enhancing Public Benefit through Urban Farming in the Greater Western Sydney Parklands

On behalf of the undersigned appointees to the Western Sydney Parklands Community Trustee Board (CTB), I am writing to recommend a series of actions to maximize public benefit in urban agriculture within the Greater Western Sydney (GWS) region.

Preamble:

Whereas Greater Western Sydney (GWS) has a heritage of [settler-colonial land planning](#) that has until recently provided significant regional food security for Greater Sydney's inhabitants;

Whereas [many tenant farmers have now been displaced](#), and many landowning farmer have sold their lands to property developers;

Whereas the Greater Sydney Parklands Trust (GSPT) is a significant landholder in the GWS region, with a [Plan of Management 2030 \(PoM\)](#) that designates 5% of its land holdings for urban farming operations, and where only 3% is currently allocated for urban farming due to creative challenges in incentivizing uptake from more community-based, new, and emerging farmers;

Whereas GWS has a disproportionate population of multi-generational, socio-economically disadvantaged [Australians impacted by diabetes](#) and other life-threatening conditions influenced by [social determinants of health](#);

Whereas GWS is home to the [largest urban inter-tribal Aboriginal and Torres Strait Islander community in Australia](#), and is a place of first contact for the subjugation of First Nations people to the land and economic planning regime of English colonial settlement;

Whereas GWS is [among the most culturally and linguistically diverse \(CaLD\) communities in Australia inclusive of refugees and other migrants](#), with many having fled the historical and contemporary effects of extractive colonial regimes in their home countries;

Whereas the [WSP Plan of Management 2030](#) (PoM) lacks a strategy or policy for leveraging its public benefit mandate and urban farming commitments to support the [critical food security needs of GWS's most vulnerable communities](#), including increasing local food shelf access of fresh and nutritious produce for individuals and families in need;

Whereas other NSW government agricultural [land and economic planning in the region prioritizes high tech agriculture](#) for premium export markets that are socio-economically and environmentally extractive for the GWS community;

Whereas the current PoM prioritizes well-capitalized private commercial farming typically consisting of annual and biennial crops, including ornamental crops that do not deliver food security benefits and are less sustainable for soil health and biodiversity than mixed perennial agroecological systems;

Whereas the NSW Department of Primary Industries has divested its agriculture extension service from the GWS region, and no comparable service has taken its place;

Whereas there is no capacity and capability building support service for the nuanced and structural needs of community or charity-based migrant, refugee, young, or emerging urban farmers interested in farming in the WSP;

Whereas the current PoM does not accommodate public-private-people partnerships that could include non-commercial farming using agroforestry, social, and care farming approaches that prioritize social and environmental benefit for GWS communities;

Whereas the current PoM intends to phase out all residential tenancies by 2030, retaining land provisions for animal boarding and hotels for tourism commerce, but not for farm workers who rely on farm-accessible accommodations;

Whereas the current PoM makes no provision for more affordable alternatives to hotel accommodation, such as youth hostels, or other innovative forms of affordable accommodation, to make urban farming more accessible for GWS growers, eaters, and learners who do not already live in the parklands;

Whereas GSPT offers [no governance and decision-making mechanism for collaborative or empowered forms of public participation](#) (according to the IAP2 spectrum) in the WSP urban farming planning and decision-making process;

We, the undersigned members of the Community Trustee Board do hereby recommend the following course of action to the Greater Sydney Parklands Trust Board of Directors.

Recommendations:

The undersigned appointees to the WSP CTB recommend the following action steps to be commissioned by GSPT within the next 12 months. We advocate for an innovative approach to meeting the urban farming mandate of 5% that explicitly includes and caters to community-

owned and charitable farm enterprises, which may include; social or care farms, Aboriginal native food forests, permaculture parks, and farmer/landcare worker accommodation.

1. Institutional Culture Audit:

- With the intended outcome of empowering “vulnerable” and other community members in GSPT governance and decision-making processes, determine what legislative, policy, procedural, and personnel factors help or hinder the community participation and engagement directive in the PoM to “encourage the Western Sydney community... to develop a sense of ownership” in the WSP. This audit will identify barriers and enablers to meaningful, direct participation in planning conceptions, designs, deal-making, and decision-making. Consult the International Association for Public Participation (IAP2) spectrum for support in understanding how to empower communities to feel a material and justifiable sense of ownership. The IAP2 is an international member association which seeks to promote and improve the practice of public participation or community and stakeholder engagement, incorporating individuals, governments, institutions and other entities that affect the public interest throughout the world.

2. Leading Practice Study:

- Investigate successful cases of socio-economically diverse, community-empowered, and cooperatively-owned urban agroecology models that are facilitated or hosted by park systems. Focus on those that center equitable, localized, or regionalized public benefit, including models informed through partnership with local First Nations peoples and that adapt [Indigenous Ecological Knowledge](#) (IEK) approaches to land stewardship, resource provisions, economic value creation, and equitable distribution of “[natural capital](#)”. Apply GSPT’s [Reconciliation Action Plan deliverable](#) to “Research best practice and principles that support partnerships with Aboriginal and Torres Strait Islander stakeholders and organisations”. The output of this step will include organisational development recommendations on internal changes required to empower communities to feel the sense of ownership outlined in step 1.

3. Scoping and Feasibility Study:

- Synthesise and translate learnings from the organisational audit and leading practice study into actionable PoM amendments that will meaningfully and measurably enhance participation and “sense of ownership” outcomes that equitably reflect the First Nation, culturally and linguistically diverse (CaLD), low income, and other community groups and families (customers and users) across GWS. This should include more direct and influential involvement in each stage of the urban farming planning and development project lifecycle, such as planning vision, concept, and design inputs, key decision-making processes, quality assurance of project outputs; as well as other interrelated planning activities and outcomes.

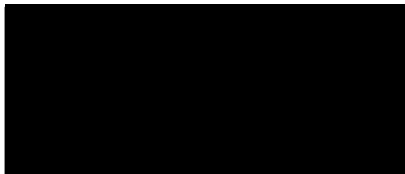
By adopting these recommendations, the Greater Sydney Parklands Trust can make a significant advancement toward meeting the PoM shortfall of 2% of unallocated land designated for urban farming use; as well as GSPT’s broader commitments to the public health and well-

being of GWS communities by addressing our food security, cultural and biodiversity, and sense of ownership goals. **After implementation of the project recommendations, achievement of these goals will be measured by increased uptake of urban farming opportunities in the WSP that can be attributed to these changes.** We look forward to GSPT's adoption of these recommendations and collaborating closely with relevant partners to achieve these public benefit outcomes.

Thank you for your consideration. We are available for further discussions to support action steps.

Earnestly,

Douglas Belton II



Acting Chair, Western Sydney Parklands Community Trustee Board

CTB Board Members:

Member 1 [name withheld]

Member 2 [name withheld]

Attachment B

H.M. Makinster, '[Opportunities for Incorporating Food Landscapes in Public Parks](#)', Scripps Institution of Oceanography, June 2022.