

**Submission  
No 26**

## **REVIEW OF THE GREATER SYDNEY PARKLANDS TRUST ACT 2022**

**Organisation:** Cumberland Bird Observers Club

**Date Received:** 31 January 2025

My name is Martin Mansfield. I am the Conservation Officer of the Cumberland Bird Observers Club (CBOC). Thank you for the opportunity to make this submission which has been approved by the club's executive committee.

CBOC has over 400 members from throughout the Sydney region and several thousand followers on its social media. Its objectives include:

- To encourage knowledge and enjoyment of native birds
- To actively promote the protection and conservation of native birds and their habitat.

CBOC undertakes regular birding outings in different parts of Greater Sydney Parklands.

In relation to the first term of reference of the inquiry, ie whether the policy objectives of the Greater Sydney Parklands Trust Act 2022 remain valid, CBOC believes that:

- the Act needs to explicitly state the objective of ensuring the retention of existing native vegetation in Greater Sydney Parklands and preferably its expansion. Vegetation cools the environment which will be increasingly important as Sydney, and especially western Sydney, feels the effects of climate change. Of course, from the specific perspective of CBOC, native vegetation is essential for the survival of wildlife including birds which will also suffer the impacts of climate change. Open grassy areas do not provide the same benefits that native vegetation does. We certainly agree with the need for connectivity of green corridors mentioned in Object (d) of the Act.
- In relation to the previous point, the current Objects of the Act are too broad and open to interpretation. Object (c) includes “to ensure ... the protection of the environment within the parklands estate”, and Object (e) includes “promoting and increasing the ... environmental values of lands within the parklands estate”. Exactly what the term “environmental values” means is open to interpretation. Clearly neither of these Objects would prevent the removal of native vegetation in the parklands.

In relation to the second term of reference of the inquiry, ie whether the terms of the Act remain appropriate for securing these objectives, CBOC believes that:

- Clause 15 (1) (a), “The Trust has the ... function to conserve, restore, enhance and ensure no reduction in the extent of the net existing natural environment of the parklands estate”, does not prevent the removal of existing native vegetation. It would be possible under this clause to remove vegetation and then plant new vegetation thereby retaining the net existing natural environment of the parklands estate. However existing and new vegetation are not comparable in terms of the vegetation providing cooling of the environment and habitat for wildlife so doing this would in reality mean a reduction in the utility of the “net existing natural environment of the estate”.
- Clause 20 of the Act should specify that development of agency land or the GSPT estate must not involve the removal of existing native vegetation.
- the same issue arises in relation to Clause 21 (1) (b) as outlined above in relation to Clause 15(1) (a).
- Clause 25 (2) should specify that any proposed development must not involve the removal of existing native vegetation.

Yours sincerely,  
Martin Mansfield