

**Submission  
No 39**

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

**Organisation:** Australian Institute of Landscape Architects (AILA)

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The Hon Peter Primrose MLC  
Parliamentary Committee Chair  
For the Joint Select Committee on the Greater Sydney Parklands Trust  
Parliament of New South Wales

Email: [GreaterSydneyParklandsTrust@parliament.nsw.gov.au](mailto:GreaterSydneyParklandsTrust@parliament.nsw.gov.au)

Telephone: (02) 9230 2686

Dear Mr Primrose,

**Subject: Advocacy for comprehensive review of the Greater Sydney Parklands Trust (GSPT) Act**

The Australian Institute of Landscape Architects (AILA) is the peak national body for Landscape Architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship. We provide our members with training, recognition, and a community of practice, to share knowledge, ideas and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design and planning of the natural and built environment.

In operation since 1966, AILA represents over 3,500 landscape architects and promotes excellence in planning, design and management for life outdoors. Committed to designing and creating better spaces in Australia, landscape architects have the skills and expertise to improve the nation's liveability through a unique approach to planning issues via innovative integrated solutions. In doing so, landscape architects contribute towards better environmental, social and economic outcomes for all Australians.

This AILA submission is made by the AILA NSW Advocacy Committee. The work of landscape architects is recognised for creating liveable cities and sustainable design outcomes for everyone, our members help shape many projects across Australia, creating the vibrant community spaces for all.

We believe that AILA, through its advocacy, will significantly contribute to a better-informed urban development decision-making process, the enhancement of our urban greenspaces, and long-term community wellbeing.

While we acknowledge GSPT's management progress since 2022, we identify several critical areas for improvement of landscape heritage protections in the Act's framework to support the management of the significant cultural landscapes of the Greater Sydney Parklands.

We acknowledge the Traditional Custodians of the lands and waters throughout Australia and pay respect to Aboriginal and Torres Strait Islander cultures and Elders past and present.

## Background

This review is a critical step in evaluating the Act's effectiveness in achieving its policy objectives, particularly maintaining and improving the Greater Sydney Parklands estate, facilitating First Nations connections to Country, conservation of natural and cultural heritage values and fostering meaningful community engagement.



The five iconic parklands under GSPT management hold significant heritage status: *Parramatta Park* is World and State heritage-listed; *Centennial Park* and *Moore Park*, *Fernhill Estate*, and *Callan Park* are State heritage-listed; and *Western Sydney Parklands* contains Local Environment Plan (LEP) listed heritage items. Despite these statutory heritage protections, the GSPT Act does not explicitly reference the relevant legislation and does little to guide the process of applying and interpreting these protections. Additionally, non-statutory guidelines for heritage place management, such as the Burra Charter, or Conservation Management Plans, are not referenced in the Act.

These omissions raise concerns about the Act's governance framework for the long-term protection and management of these significant cultural landscapes. The current structure lacks clear guidance for protecting these heritage assets while allowing development and use of the parklands.

Comments in 2022 by Emeritus Professor James Weirick of the UNSW School of the Built Environment, on the Greater Sydney Parklands Council Trust Bill remain relevant to the current review:

*Membership of the Greater Sydney Parklands Council to be mandated under the new Act to include a First Nations man and a First Nations woman, and a majority of members with relevant expertise in fields such as park management, ecological planning, biodiversity conservation, recreation planning, community empowerment, landscape design, cultural landscape conservation and/or heritage conservation.*

*The Greater Sydney Parklands Council to be supported by specialist staff with appropriate qualifications and skills in the same way as the Heritage Council of NSW is supported by the specialist staff of Heritage NSW.*

*The Greater Sydney Parklands Council to be empowered under the new Act to promote public participation in the identification, acquisition, planning, design and management of new parklands, greenways and reserves to realise the Green Grid concept for Metropolitan Sydney.*

## Recommendations

### 1. Legislative Integration

Amend the Act to:

- Explicitly reference and align with NSW Heritage Act 1977, Environmental Planning and Assessment Act 1979, and Environment Protection and Biodiversity Conservation Act 1999.
- Incorporate non-statutory guidelines including the Burra Charter 2013
- Add provisions in Division 3, Planning to require Conservation Management Plans (CMPs) as foundational documents that inform Plans of Management
- Reference documents that support Object 3(b) to facilitate First Nations peoples' connection to Country



## 2. Conservation Management Framework

- Amend the Act to mandate a comprehensive suite of CMPs including:
  - An umbrella Greater Sydney Parklands CMP
  - Individual parkland CMPs
  - CMP updates every 5-10 years to ensure currency
  - Refer Heritage Council of NSW guidelines for CMPs
- Amend the Act to stipulate the use of CMPs to:
  - Guide heritage protection and interpretation of the parklands
  - Guide decisions about heritage assets
  - Measure success of natural and cultural management outcomes
  - Enable the GPS Board, the Chief Executive and Senior Leadership Team, and the Community Trustee Board to monitor progress of the CMP recommendations
  - Facilitate stakeholder engagement, including First Nations communities
  - Demonstrate the GSPT's cumulative care of parklands
- Ensure CMPs inform Plans of Management for each parkland

## 3. Heritage protection

- Strengthen provisions in the Act for safeguarding cultural landscapes from commercial impacts
- Define clear criteria for inappropriate developments that could erode:
  - Green open spaces
  - First Nations peoples' connections to Country.
  - Natural and cultural heritage values
  - Visual and spatial qualities
  - Environmental protections
- Amend the Act to establish explicit prohibitions on inappropriate materials, including synthetic surfaces such as plastic, synthetic or artificial grass, that:
  - Cause irreversible impact to cultural significance
  - Violate minimal intervention principles
  - Disrupt historical context and cultural values
  - Damage biodiversity and natural heritage
  - Contradict sustainable landscape management practices

## 4. Governance and Expertise

- Include AILA Registered Landscape Architects with expertise in significant cultural landscape assessment and heritage conservation on the Trust's Board and leadership teams.
- Implement evidence-based decision-making frameworks such as CMPs for managing the GSP
- Establish clear management structures with heritage expertise
- Maintain current 10-year limit on licenses to protect long-term heritage values



## 5. Community Engagement

- Establish statutory mechanisms for meaningful community involvement
- Strengthen consultation requirements for consideration of any proposed changes to the GSP
- Ensure transparent decision-making processes for management of natural and cultural values
- Include specific provisions for First Nations engagement in CMPs

The Act requires specific amendments to embed robust landscape heritage protection and management frameworks for these invaluable cultural assets. While its objectives are commendable, the implementation framework needs strengthening to ensure Sydney's parklands remain accessible, sustainable, and culturally respectful for future generations.

To fully realise their potential, we urge your leadership to embrace a cohesive and visionary approach—one that acknowledges these parklands as interconnected cultural landscapes requiring careful stewardship.

Please include our contact information on your mailing list for updates regarding this review. We remain committed to contributing to ongoing discussions about these vital parklands' future.

Sincerely yours,



David Moir

AILA NSW President