

Mr McKee,  
General Manager,  
Ku-ring-gai Council,  
Locked Bag 1006,  
GORDON NSW 2072

5 August 2021

Dear Mr McKee,

**REF: S06604/2 St Ives Showground and Precinct Lands Plan of Management**

As you would be aware, Friends of Ku-ring-gai Environment (FOKE) is a community-based organisation whose mission is *“to work for the maintenance of Ku-ring-gai’s heritage and the enhancement of the existing traditional character and amenity of its environment, both built and natural”*.

The St Ives Showground & precincts are located in an exceptional bushland setting with high quality water catchments and adjacent National Parks. Duffy’s Forest tree canopy and areas of Duffy’s Forest Ecological Community exist on the Showground site. The St Ives Showground (SIS) retains items of historical, cultural, and social significance.

Nature based activities and education in addition to existing activities linked to the history of the Showground provide an opportunity for a unique experience. The issue of concern is maximising recreation while maintaining the exceptional importance of the biodiverse areas in the precinct.

The vision statement states that “the St Ives Showground and Precinct will become a regional destination parkland integrated with the landscape and balancing community, environmental, cultural and heritage values. The precinct lands will provide a range of accessible, connected and inclusive community, recreation, education and event opportunities for generations to come.”

FOKE supports this statement and our submission highlights 23 recommendations for amendment in the Plan of Management (PoM) where uses are not compatible with this vision, including areas for improvement.

FOKE’s position is:

- The PoM must recognise, maintain and promote the historic, cultural, environmental, and social importance of the Showgrounds to the community.
- All activities should be located, designed and managed so that there is no erosion, sediment transport, nutrient run-of or spread of introduced weeds into the surrounding areas, Ku-ring-gai National Park and Davidson National Park. Fire hazard reduction methods should be incorporated in all developments.
- To safeguard the environment, impacts of development must be evaluated and measures employed to mitigate any adverse environmental impacts.
- In the management of existing uses and in the planning of future uses of the site, care must be taken to not conflict with other activities on site.

## 2.4 Heritage and Culture

### Non-Aboriginal Culture

The Draft PoM (Heritage Value, Page 17) recognises the SIS *“is a place of exceptional significance at a local level and high significance at state level for its ability to demonstrate the themes related to agriculture and defence in Australia”*. (Phillips Marler, 2006)

Heritage and Culture, Non-Aboriginal Culture (p19), states that the Phillips Marler heritage assessment identified 13 potential heritage items. This is incorrect, the report identified 15 items, and two have disappeared apparently through neglect. Issues are

- Two of the items identified in the Phillips Mahler Report 2006, the Horse Superintendent’s Office and the Grandstand have disappeared.
- The items identified in the heritage report were never deposited with the Heritage Office therefore they have no legal status.
- The Conservation Plan proposed in the Heritage Report has never been implemented. Currently the Bar Building, the Army Relief Map and the Sewer Treatment Facility are falling into disrepair.

It is a disgrace that Council has failed to manage these assets in accordance with the principles of the ‘Burra Carter’.

**#1 Recommendation:** The items identified in the Phillips Marler Report 2006 should be nominated with urgency to the NSW Heritage Office for listing and a conservation plan adopted.

Amend: **7.2 Protecting and Enhancing Environment and Heritage Values** Performance target to specify pursuing statutory listing of non-aboriginal items and given High Priority.

## 2.5 The Natural Environment

The Draft PoM description of soil, hydrology, fauna and flora reinforces the environmental richness and sensitivity of the precincts.

The intensity of the proposed activity and development and the siting of facilities on all precincts will determine loss of habitat, soil erosion, water erosion and weed dispersal.

- The Showground is vehicle dependent. To decrease the need for car parking, on site public transport must be improved.
- Additional carparking off-site such as at the former Caltex Station site on Mona Vale Road - Lot4 DP628197 (Figure 2 p4) - should be investigated. This site could provide paid car parking and a bus stop with pedestrian access directly into the Showground. For other commercial uses the site will require costly decontamination.

**#2 Recommendation:** Section 7.1 Providing Outdoor Recreation, Community and Regional Events- Providing parking to facilitate safe access p85. Add: Investigate feasibility of additional parking, bus stop on Lot4 DP628197 (the former Caltex Station) with safe pedestrian access directly into the Showground.

### 2.7.2 Vehicular access and circulation

It is understood that council seeks an internal link road within the Showground and also a link between the three precincts Wild Flower Garden, Nursery and Showground.

Any road links must not fragment the endangered vegetation communities or result in erosion or increased water flow.

**#3 Recommendation:** Add: The use of the fire trail at the Showground is not supported to create an internal link road within the Showground or to the other precincts.

There is currently a gate in the fence at the entrance of the Nursery site into the Wildflower Garden. A path/road from this point runs directly to Caley's Pavilion. This could be a viable link between the two precincts, then continue to the Showground parallel to Mona Vale Road.

**#4 Recommendation:** For the road linking the three precincts, Section 7.1 Providing Outdoor Recreation, Community and Regional Events - Enhancing safe access to and between precinct lands. Add: investigate feasibility of a new road or shared pedestrian cycle path running parallel to Mona Vale Road.

## 2.10.2 Sport

The plan proposes to explore the use of the SIS for increased sport activity including regional sports training and competition. The SISPL is highly valued as a destination of passive recreation in an idyllic natural setting (**ref: Recreation and Social Value p 17**). Intensified formal sport use will threaten the unique experience valued by local residents and visitors.

Should organised sporting use be increased on the site, it must not be at a regional level or with all-weather surfaces. With intensified sport, additional parking will be required as well as change rooms and club facilities. There is also a likelihood of sports fields' use to conflict with event usage in terms of access to facilities and impact on playing surfaces.

An added risk is the threat of dominance of sport and the loss of the unique nature-based quality of the site.

**#5 Recommendation:** For any reference to increased sport use, specify that Regional Sport and all-weather surfaces are excluded.

## 3.3.3 Categorisation of Community Land

Categorisation reflects the Council's intentions for future management and use of the land.

**# 6 Recommendation:** Add a reference in 3.3.3 to (a) 4.3.2 Core objectives for Community Land which defines the various categories and core objectives. (b) Figures 2, 3, 4 & 5 which show the categorisation of each precinct.

Similarly cross reference 4.3.2 Core objectives for Community Land and Figure 2-5.

## 5. Future Use and Development

### 5.1 Current and Future Facilities and Use

#### 5.1.1 St Ives Showground: Current Facilities and Use

The PoM fails to address the future of the St Ives Show that has existed for 100 years.

**#7 Recommendation:** Specify that any additional uses need to ensure that Showground site can be utilised year-round, without compromising the operation of the St Ives Show.

The use of the site for equestrian activities has a distinct connection to the history of the Showground itself and the agricultural nature of show activities more generally. Current licence holders maintain the area well and the frequent mowing prevents spread of weeds into neighbouring bushland.

**#8 Recommendation:** Equestrian activities should be maintained. They provide a point of difference and add to the uniqueness of SIS. Compatible equestrian commercial activities such as pony rides could be explored.

The Regimental Aid Post Building is identified as having heritage value, to be conserved and used. This is supported however it is of concern that council omits the other buildings and items listed as being of heritage significance in the Phillips Marler Report 2006 must also be conserved.

As council plans to promote the historical and cultural values of the site, all items of heritage value should be included.

**#9 Recommendation:** Include conservation of all items identified as having heritage value (Phillips Marler 2006), conserve them and investigate options for adaptive reuse. (Ref: submission 2.4 Heritage and Culture, Draft PoM Heritage Value p17)

### **Future Facilities and Use**

Development of commercially operated outdoor nature-based activity such as high ropes is supported conditional on its location and measures taken to mitigate any environmental impact. This type of activity relates to the natural bushland setting.

**#10 Recommendation:** All revenue from commercial activities must be reinvested in the maintenance of the Showground & Precincts.

The mini-wheels has led to significant top-soil erosion and soil compaction. The proposal for regeneration of the site, which is Duffy's Forest Ecological Community, is supported. As Duffy's Forest Ecological Community is highly sensitive to nutrients and water run-off from cleared or developed areas the proposal for nature-based activities or camping site is considered incompatible and it is **NOT** supported.

**#11 Recommendation:** The Mini-Wheel site should be the focus of a rehabilitation programme but camping on the site is not supported as it will lead to further degradation (soil erosion, introduction of weeds). Council has not specified what is meant by "repurposing" the site. Specify that any activity that constitutes a Threatening Action under the EPBC Act. Is excluded.

Given all the activities potentially proposed for the Showground and the issues with intensity of use and conflict with different user groups, the preferred site for camping is the former Ku-ring-gai Nursery (KCCN). In addition, consolidation in a designated area would discourage illegal camping, reduce the conflicts with other users and facilitate supervision.

**#12 Recommendation:** It is proposed that Camping on any precinct should be specified as eco-camping. The preferred option is to consolidate camping activity in a designated area, preferably the KCCN so that camping specific infrastructure (e.g., amenities, sullage and electricity) is limited.

Community gardens are incompatible with the promotion of environmental education and the sensitive native vegetation surrounding the site due to fertilisers, and spread of seeds into neighbouring bushland

**#13 Recommendation:** Delete community gardens. Community gardens should be located within easy access of high density living in a town centre, not in an environmentally sensitive area.

### **Page 72 St Ives Showground Precinct as a regional destination.**

**#14 Recommendation:** Rebranding of the Showground is not supported. The Showground established in 1926 has iconic status within the history of the St Ives area and continues to be part of the lifestyle identity for which the district is renowned.

The statement is made on Page 72, with regards to the Council's aspiration for SIS to 'Achieve the precinct's full potential as a seven day a week, four seasons integrated mixed-use destination for international and domestic visitors.' However, there is no detail on the definition of 'Mixed use'. Accommodation in SIS is not supported.

**#15 Recommendation:** Define the 'Mixed Use' term for clarification of the intended use.

### 5.1.2 Ku-ring-gai Wildflower Garden

The KWG contains 2 endangered ecological communities and 18 threatened species of flora and fauna. It also displays Australian native flora to the area. It is noted that the terrestrial orchid *Genoplesium baueri* has been identified in 5 locations within the KWG and it is part of a targeted strategy under the Saving Our Species program.

It is presumed that measures will be taken to limit the intensity of activity in the KWG so that any proposed changes will not directly or indirectly threaten conservation of the flora fauna (habitat clearance, trampling, introduction of weeds).

The proposal for a link road to the KCCN is a potential issue. Council has not provided a concept plan. However, use of the fire trail has been mooted. There is a concern that any roadway will require clearing of areas either side of the road to meet fire safety standards or resurfacing. Vehicle use will cause erosion, water run-off into pristine bushland and bring in weeds. This would be severely detrimental to the conservation and protection of the fauna and flora in the area.

**#16 Recommendation:** Any vehicle connection to the other precincts must exclude the fire trail between the KWG and SIS. Vehicle use of this fire trail will cause compaction and erosion, impact negatively on the down slope vegetation which is currently in good condition and avoid conflict with walkers.

It is proposed that a connecting link to the KN be explored between Caley's Pavilion and the existing access point to the KCCN. It would be the shortest road link.

### 5.1.3 Ku-ring-gai Nursery Site: Current Facilities and Use

Support for retention of existing uses (note, the buildings and shade houses are in total disrepair), except for storage of landscaping materials.

**#17 Recommendation.** Investigate the feasibility of consolidating the landscaping materials, park furniture and recycled materials with the materials kept at the Former Green Tip Site.

It is common knowledge that the nursery site is often waterlogged. The source of the water however remains unestablished. Part of the Nursery is affected by a riparian zone, the upper limit of the site retains a dam and an old cottage presumably dating back to when the site was a piggery and agricultural garden.

**#18 Recommendation. Include** as a High priority, council must investigate and identify the source of the waterlogging so that future planning options for the Nursery site can be determined in the shortest possible time frame.

## 7.1 Providing Outdoor Recreational, Community and Regional Events

### Table 13-Action Plan For Providing Outdoor Recreation, Community and Regional Events.

**Page 83 Provide for additional formal sporting use on SIS:** FOKE objects to any increase formalised sport at a Regional Level. The Showground should retain its unique values and not be turned into a sport centre. This is inconsistent with the vision statement of integration in to the landscape and its focus on community, environmental, cultural and heritage values.

**Ref. 2.10.2 Sport** With intensified sport, additional parking will be required as well as change rooms and club facilities. There is also a likelihood of sports fields' use potentially to conflict with event usage in terms of access to facilities and impact on playing surfaces. An added risk is the threat of dominance of sport and the loss of the unique nature-based quality of the site.

**#19 Recommendation:** Add: with the exclusion of regional sport training and competition from the PoM.

## Page 84 **Develop Options for Queen Anne Arena: Ref. 5.1.1 SIS, Current Facilities and Use**

The use of the site for equestrian activities should be maintained. This use has a distinct connection to the history of the Showground itself and the agricultural nature of show activities more generally. Current licence holders maintain the area well and the frequent mowing prevents spread of weeds into neighbouring bushland.

**#20 Recommendation** Add: Retain equestrian activities if lawful

Page 85 **Provide appropriate community access to KCCN.** The various directions proposed appear to be inconsistent with the proposal for the site retention of existing uses stated in 5.1.2

As suggested, an additional action should be incorporated as a High priority as per *Recommendation #18*. It is common knowledge that the nursery site is often waterlogged. The source of the water remains however unestablished. Part of the Nursery is affected by a riparian zone, the upper limit of the site retains a dam and an old cottage presumably dating back to when the site was a piggery and agricultural garden.

## 7.2 Protecting and Enhancing Environment and Heritage Values

**Page 107 Significant heritage sites have statutory protection.**

The target to pursue listing of “all significant heritage sites” is understood to refer to aboriginal sites only.

Confusion arises because council refers only to engagement with indigenous leaders and includes a different performance target for non-aboriginal heritage.

**#21 Recommendation** In order to be clear and consistent, the performance target should refer specifically to pursuing listing of all significant “aboriginal and non-aboriginal heritage items and sites “if this is the objective.

Otherwise, an additional Performance target specifying "pursuing statutory listing of non-heritage items" should be added, and given High priority.

Page 108 the Performance target states "non-aboriginal heritage items are protected and conserved as part of the living landscape and potential damage prevented”.

As stated by council in 2.4 Heritage and Culture, Non-aboriginal culture, “no items within the SISPL are listed on any statutory heritage lists” including the Ku-ring-gai LEP. Furthermore, the non-aboriginal heritage items have been left to degrade by neglect. Ref: **2.4 Heritage and Culture**

It is unacceptable that Council suggests a priority of O (ongoing) for this performance target when protecting and conserving aboriginal heritage (p105) receives a level of High (3-5Years) priority. No action has been taken in 15 years to protect the items identified as of heritage value.

**#22 Recommendation** Amend the priority for this action to High (consistent with aboriginal heritage) and to ensure a measurable performance target and timetable.

Green Waste and Composting are inappropriate activities for the KCCN given risks of introduction of weeds into the surrounding area. The idea conflicts with the educational and conservation plans for the other precincts. This type of facility, including solar farming should be considered on the Former Green Waste site.

**#23 Recommendation:** Remove any reference to green waste and composting activities in the KCCN.

FOKE supports the concerns raised in the stakeholder engagement conducted in October 2020. Specifically, those of continued fauna and flora conservation, protection and education, balancing local community use with major or special events and increased informal recreation use and activities.

The use of SIS as a regional sports centre is not supported as this is an intensive activity which will be detrimental to the natural values of the site, and will severely limit local community use of SIS for both passive and active recreational activities.

Thank you for the opportunity to comment on this PoM and we look forward to your response to our recommendations.

Yours sincerely,

Kathy Cowley  
PRESIDENT

cc Mayor and Councillors  
cc The Hon Jonathan O'Dea MP Member for Davidson  
cc The Hon Alister Henskens SC MP Member for Ku-ring-gai  
cc The Hon Paul Fletcher MP Member for Bradfield