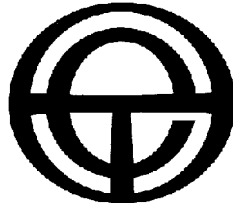


METROPOLITAN STRATEGY
SYDNEY GREATER METROPOLITAN REGION
- TARGETS
- MONITORING AND REPORTING



TOTAL ENVIRONMENT CENTRE

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Level 2, 362 Kent Street
Sydney 2000
Ph: 9299 5599

INTRODUCTION

Total Environment Centre (TEC) welcomes the release of the NSW Government's Metropolitan Strategy discussion paper. The Metropolitan Strategy represents a crucial opportunity to place Sydney on a more sustainable footing and reduce the city's ecological footprint. TEC believes that the success of the strategy will depend on the establishment and implementation of ambitious sustainability targets.

There are four key reasons to adopt and embed targets in the Strategy:

1. They create certainty for investment in new environmental technology and approaches, allowing them to be mainstreamed. The current prime example is BASIX.
2. They provide credibility to a Strategy and subsequent activity because they create a basis for accountability and public reporting.
3. They give a strategy 'concreteness' and help avoid public scepticism about vacuous plans and announcements.
4. They express a credible vision about environmental sustainability because they acknowledge the environment is not an optional extra in metropolitan planning.

Detailed comments in relation to a number of key areas are provided below.

SETTING TARGETS

It is essential that targets be based on genuine sustainability requirements - not simply be set at levels that the Government believes can readily be met within the timetable of the strategy. TEC has been concerned for some time by what appears to be a campaign by Sydney Water, for example, to ensure that demand management targets are set at levels the Corporation feels it can achieve, rather than at levels required to prevent the construction of a new dam.

Basing targets on sustainability will, by necessity, mean that a number of the targets will be challenging. This is essential if the strategy is to be credible and achieve real progress towards creating a sustainable city.

Targets in the strategy should build and improve on existing targets to ensure continuous improvement in performance over the life of the strategy towards an ultimate target. There should be no resetting of existing targets to less stringent levels. TEC is aware, for example, of proposals to revise *Action for Air* targets.

Naturally global targets will need to be made regional and local. This should be worked through the new SEPP and LEPs, taking account of differences in location, current practices and opportunities.

MONITORING AND REPORTING

TEC is of the strong view that independent review of progress and verification of trends should be regularly reported and not simply be reliant on current State of the Environment reporting.

A group of key stakeholders and experts should oversee an annual Metro Ecological Footprint Report. Funding should be sourced from the developer levies.

THE TARGETS

The following targets adopt those from existing strategies, but since they are on different timeframes it will be necessary to extend them out to 2030. TEC supports steep downward trends in the amount of pollution or resource use.

Water

The imbalance between water supply and demand for Sydney has been well documented. With average annual demand of 627 Gigalitres (GL) already exceeding the sustainable yield of 600 GL (without environmental flows) the need for a rigorous demand management target is clear. Effective environmental flows will require around 100 GL per annum (as estimated by the environmental flows expert panel). The true sustainable yield is, therefore, 500 GL. This is particularly so in the light of the drying climate.

The recently Metropolitan Water Strategy is an important step towards sustainable water management, however, further work will be required. The Metropolitan Water Strategy sets targets of reducing demand to 570 GL by 2008 and 550 GL by 2011. The Metropolitan Strategy should set target of continuing this rate of demand reduction until a target of 500 GL is reached and then maintaining demand at this level.

Meeting this target will require major efforts on demand reduction and promotion of effluent reuse. While the Metropolitan Water Strategy proposal to require effluent reuse in new urban release areas is a valuable step forward, reuse will need to be developed in existing areas of urban development. Major redevelopment projects and industrial applications will provide the most obvious opportunities for developing reuse applications. Meaningful short, medium and long term targets should be set for water recycling, for example, and increase equivalent to 3% of total water consumption per annum. This would allow a recycling objective of 100GL to be met by 2030. As part of achieving this, the large growth in housing in established areas will need to include recycling, preferably through BASIX (apartments) and encouragement of private investment.

Land

Curbing urban sprawl and loss of bushland must be a key plank of the Metropolitan Strategy. The target of 70% redevelopment and 30% new release areas should be maintained.

Maximum protection of bushland communities and corridors and maintenance of a permanent green belt of open space must be key targets of the strategy, as should targeted recover/stabilisation of nominated threatened species and vegetation communities (TEC has yet to assess the detailed maps of new release areas). Additionally agricultural practices will need to reduce their polluting and habitat fragmentation impacts, through programs that implement best practice.

These targets will require the development of measures to protect land in public and private ownership. Such measures should include:

- allocation of acquisition, incentive and restoration funding from the Development Commission;
- strict clearing and development controls on the green belt, whether privately or publicly owned through planning controls such the proposed SEPP and application of the Native Vegetation Act maintain or improve test, in order to dampen speculative clearing;
- use of permanent conservation orders; and
- an act of parliament to protect publicly owned green belt and strict controls and transparency on any leasing and other alienation proposals

Energy/Greenhouse

The NSW Greenhouse Office is currently developing state targets and the NGACs Scheme has an inbuilt target for the electricity sector. In general the global target should be a rapid advance towards a 60% cut in CO₂ emissions by 2030. This will require modification of the NGACs target which is expected to be achieved by 2007, as due to its per capita expression it will then allow absolute emission growth. This could be achieved via the setting of a new lower target of if effective, introduction of a broader emissions trading scheme.

Waste

The State Waste Strategy has adopted the following targets for 2014:

Increase resource recovery and diversion from landfill to 66% for municipal waste; 63% for commercial and industrial; 76% for construction and demolition.

These are achievable if new infrastructure is established soon and the Metro Strategy should include appropriate regulatory arrangements to direct waste flows to AWT and overcome locational barriers. The proposed Waste Industry SEPP should assist. In the

case of c/d the target has almost been achieved due to the impact of the waste levy and investment in recovery facilities. Generally the first phase of resource recovery will involve new central infrastructure, but in order to take the targets further up to 2030, extensive extended producer responsibility programs will be needed.

Air quality

World Health Organisation (WHO) and National Environment Protection Measures (NEPM) guidelines for air pollution regularly exceeded in Sydney. Improving air quality to meet these goals is a crucial component of environmental sustainability.

The Metropolitan Strategy should include both WHO and NEPM air quality targets. Targets relating to each of the strategies in the Government's *Action for Air* program should be included in the strategy. In particular, meeting the targets of stopping per capita VKT growth by 2011 and stopping total VKT growth by 2021 will be essential. This will require a major investment in public transport infrastructure. Unfortunately progress to date in meeting *Action for Air* targets in relation to public transport has been poor.

While there has been some scepticism about the vkt targets, it should be emphasised that they also have an important influence on greenhouse emissions as they will reduce per capita fuel use (that can only worsen as congestion builds). Thus they should be vigorously pursued and improved up to 2030.

Targets relating to vehicle controls and fuel standards should also be included in the strategy and extended to ensure improvement over the life of the strategy.