

**The City of Sydney Submission to the House of Representatives
Standing Committee on Environment and Heritage
Inquiry into a Sustainability Charter**

The City of Sydney commends the House of Representatives Standing Committee on Environment and Heritage for the undertaking this Inquiry into a Sustainability Charter. This is a positive step arising from the Sustainable Cities report that the Standing Committee completed last year.

Establishing a national Charter is an important step in ensuring that sustainability is approached and managed at a national level and with whole of government commitment.

Public reporting will raise the community's awareness of issues relating to sustainability and also provide the community with some way of seeing how they are progressing in reaching the targets. Engaging the community in sustainability is essential to success in achieving targets.

By setting national targets a lead can be shown from the Commonwealth Government. It will also provide for a set of targets that the City is able to work with as a framework for setting its own agenda on sustainability. Presently targets are set from different levels of government and can be restrictive in allowing higher targets to be set by state or local government. The NSW government has imposed targets on residential buildings through BASIX but has deemed that these targets cannot be increased at a local approvals level.

THE SUSTAINABILITY CHARTER

The Charter will provide an opportunity for the government to provide targets that are measurable, ambitious and national. The City agrees with committee's recommendation that the Charter should be aspirational, that it should set targets for the Australian community to meet and that these should be reassessed once they have been met. These targets should also be over a certain period and have intermediate outcomes as was recommended in the Sustainable Cities report.

The Charter should work towards the integration of social, economic and environmental efficiency and sustainability. In order for the Charter to be comprehensive the key elements of water, energy and transport should be expanded to include air and water.

The Charter should focus on sustainability of urban or built environments to recognise that the majority of Australians live in cities. The long term sustainability of Australia will be dependant on how cities develop, how the resources they use are managed and how the quality of life is maintained.

The CSIRO's recommendation regarding improved benchmarking and reporting processes is supported. Presently State of the Environment reporting is different across the States. Bringing the reporting in to line at a national level will assist in measuring results and also provide an effective means of communication with the public.

THE SUSTAINABLE CITIES REPORT

The City of Sydney was pleased to see this report tabled in 2005 and agreed with many of the recommendations of the report. The leadership shown by the Standing Committee in taking the recommendations on the implementation of a Sustainability Charter and Commission is to be commended.

Response to Committee Recommendation 1

The committee recommends that the Australian Government

- *Establish an Australian Sustainability Charter that sets key national targets across a number of areas including, water, transport, energy, building design and planning.*
- *Encourage a Council of Australian Governments agreement to the charter and its key targets.*

The City of Sydney supports this recommendation as a starting point. While obtaining COAG agreement to the charter and its key targets is important equally that local government needs to be consulted and fully engaged in setting targets as they are more able to feed back responses and also influence achievements at a residential and business level.

Targets need to reflect the differences in urban and regional areas and specifically capital cities.

More important than agreed targets will be agreed implementation mechanisms and commitments to resourcing, policy and removal of institutional barriers at the state and federal levels.

Response to Committee Recommendation 2

The committee recommends that all new Government policy proposals be evaluated as to whether they impact on urban sustainability and if so, be assessed against the Australian Sustainability Charter and the COAG agreed sustainability targets.

COAG agreed targets need to reflect the impact of urbanised areas on State targets. As per the comments on Recommendation 1 it is important that this is recognised.

The implementation of this recommendation will assist all levels of government in evaluating proposals against a common set of goals.

The evaluation needs to utilise a consistent, comprehensive and transparent mechanism(s) or framework.

Response to Committee Recommendation 3

The committee recommends that:

- *The Australian Government establish an independent Australian Sustainability Commission headed by a National Sustainability Commissioner;*

- **Task the Commission with monitoring the extent to which Commonwealth funds and State and Territory use of Commonwealth funds promotes the COAG agreed sustainability targets; and**
- **Task the Commission with exploring the concept of incentive payments to the States and Territories for sustainability outcomes along the lines of the National Competition Council model.**

Not all states pass on National Competition Policy payments to local government and it is imperative that if incentive payments are paid they are paid, or required to be passed on, to the level of government responsible for the sustainability outcomes. Further, it is important that payments are monitored to ensure the targets are achieved across both urban and regional areas.

The Commission should also address issues or barriers which occur at or can be remedied at a national level, for example, the Building Code of Australia.

Other Reports

The Discussion Paper refers to the *Employment in the Environment Sector: Methods, Measurements and Messages* report recommendation regarding Mandatory Renewable Energy Targets (MRET);

.....that the Australian Government

- *retain the Mandatory Renewable Energy Target;*
- *substantially increase the Mandatory Renewable Energy Target as part of a multi-faceted approach to increase market demand for and supply of renewable energy; and*
- *implement a timely review of the Mandatory Renewable Energy Target for beyond 2010 with a view to furthering the uptake of renewable energy in Australia.*

The City of Sydney supports this recommendation and supports the increase in targets proposed by the Discussion Paper. The increasing of targets will provide a driver for research and development into renewable energy supplies and usage by suppliers and customers alike.

OTHER SUSTAINABILITY REPORTING

The Discussion Paper provides some examples of other sustainability reporting and these are good examples as possible starting points for an Australian set of principles and objectives.

Sweden's Environmental Objectives

Sweden's five principles are good foundations for developing a Sustainability Charter. These are supported by 15 environmental objectives. These objectives are focussed on the natural environment. An Australian Sustainability Charter should provide a series of objectives that are more focussed on the urban or built environment to reflect the population distribution. The City acknowledges that the protection of our natural environment is an important element of sustainability and objectives around these issues need to be addressed in the Charter as well.

The philosophy of the Swedish system with regard to public reporting being in plain language and having a set of objectives that the population can relate to and identify with is to be commended and should be used as an example for Australian reporting.

National Strategy for Ecologically Sustainable Development

The definition of *Ecologically Sustainable Development – ESD* as;

using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained and quality of life for present and future generations is increased. It requires a change in production and consumption so that they can better satisfy human needs while using fewer raw materials and producing less waste. The key to ESD is integrating environmental and development consideration in decision-making;

is supported by the City but will require quality of life to be defined through a set of principles.

The National Strategy provides a system for engagement of all levels of government through the Intergovernmental Committee and could be built upon to provide a framework for a Charter, Policy and reporting framework. Currently the reporting through this Strategy is only every two years as set by the international Commission on Sustainable Development.

SUSTAINABILITY OBJECTIVES AND THEIR MEASUREMENT

National State of the Environment Reporting

State of the Environment Reports could provide a basis for a format of reporting of the progress of a Sustainability Charter. Federally, this is prepared on a two yearly basis and would need to become a yearly report as mentioned previously. Further a standardising across all states on reporting that links back to the Federal report would be required in order to ensure a consistency in information.

The State of the Environment report allows for existing environmental, social and economic indicators in some states, and in others it includes cultural and human habitat indicators. The links between these indicators should be seen as critical to the success of reporting on any Sustainability Charter. All indicators will help the population understand how sustainability is inexorably linked through all the elements and the results from one area can significantly influence outcomes in another.

The City agrees with the proposal that a reporting framework and development of a Charter should proceed in unison. The reporting framework must reflect the aspirations and targets set by the Sustainability Charter.

The National Competition Council

The provision of funding for sustainability initiatives could be operated through a model similar to the National Competition Policy (NCP). A similar model based around a Sustainability Charter and Policy could provide a mechanism to drive reform.

The City would like to see any funding model fully engage local government and allow for targets to be set for all levels of government and relate these to funding. The funding should not be focussed at a State and Commonwealth level. Many of the

initiatives in sustainability are more effectively driven and measured at a local government level.

Australian Conservation Foundation – A National Agenda for a Sustainable Australia: 5 Tests for policy performance

This agenda has some good basic tests for monitoring achievements, in particular in relation to National Leadership and reducing greenhouse pollution. The agenda calls for the ratification of the Kyoto Protocol and the establishment of national mandatory reduction targets.

Supporting Sustainable Living is an important element of the test criteria but overall the agenda does little to address issues such as the huge use of resources by the manufacturing industries. The test is focussed on residential and commercial buildings, which while be a contributor to water and energy use in cities, are far outstripped by the industrial sector in cities.

Australian National Audit Office – Cross Portfolio Audit of Green Office Procurement

The objectives of the Cross Portfolio Audit of Green Office Procurement are valid although limited in their scope. If the Audit Office were to monitor the implementation of sustainability initiatives the scope would need to be widened to ensure that all the principles of the Charter were covered.

The expanded scope could include things such as lifecycle costing, lifecycle resource management including planning, building and infrastructure design and waste management.

Ecological Footprint

The Ecological Footprint is a tool that could be used to measure the environmental (or ecological) implications but does not allow for measuring of social or economic impacts, all part of an overall sustainability measurement.

Using the ecological footprint as a measurable objective for environmental elements will provide a readily understandable method of comparison for the population in understanding their impacts at various levels on the environment. The tool can be used at the individual, local government, state and commonwealth level and allows for these all to be compared and targets set accordingly.

The Sustainability Charter must articulate its objectives clearly and in a language that is accessible to all Australians. Targets must be measurable and achievable, but also set aspirational goals that can be achieved in the long term. Reporting needs a framework established that can allow everyone to understand where Australian is currently at, where it is aiming and how it is progressing in getting there. The Sustainability Charter must encompass quality of life as a key indicator through which the health of our cities and urban areas can be judged.

The Charter must provide methods for funding arrangements and agreements at all levels of government, not just through COAG. A framework for identifying and selecting projects for funding opportunities must be established. Funding opportunities should be focussed on projects that can achieve sustainable outcomes in areas of water, energy, waster, air quality, transport and the built environment.

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In response to the questions raised in the discussion paper the City of Sydney comments as follows;

GENERAL

Should a sustainability charter consist of aspirational statements, set targets (such as measurable water quality) or both?

The charter should identify aspiration and future desired outcomes including the establishment of understandable and measurable targets. Base lines describing where we are now need to be determined across the 5 key elements of the charter.

The charter should also outline the mechanisms for achieving these targets.

What research will be needed to develop and support the Sustainability Charter?

Research should concentrate on developing measurement systems and indicators that can capture the full gamut of the sustainability issues including social, economic and environmental impacts.

Existing data can be used for establishing base line information.

Research should also be conducted to identify successful implementation strategies.

Can existing standards (such as Water Efficiency Labelling and Standards (WELS) Scheme) be applied to the Sustainability Charter?

There are many existing tools that are currently used and should be supported in their development as part of the Sustainability Charter. The charter should also become the key driver for the future use and form of these tools including the Green Building Council's GreenStar program and the Australian Building Greenhouse Star Rating Scheme.

Consistent application of these tools and standards nationally will assist in aligning results across all levels of government.

Wherever possible the plethora of existing tools/standards should be integrated with each other and incorporated into the relevant overarching standards which currently operate. Also, every effort should be made to eliminate contradictions between standards and other supporting systems or frameworks.

Can the charter be framed in such a way to ensure that it can be integrated into all levels of government decision making?

State Governments, through the COAG agreement, should adopt the charter at a State level and through it to local government. An integrated whole of government approach will be essential to achieving targets. Partnering requirements on projects at all levels of government needs to be formalised and clearly articulated. This would clearly articulate each partner's responsibilities and resource commitment.

Will there be a cost/gain to the economy by introducing the target(s)?

The cost/gain to the economy will need to be measured over a period of time as short term investment in infrastructure and efficiency measures will result in long term economic and environmental gains.

Could a sustainability charter be incorporated into the national State of the Environment reporting?

A revised reporting structure may be required to accurately reflect a sustainability charter.

Is National Competition Policy a good template for consideration of incentive payments for sustainable outcomes?

The City of Sydney sees this as a potential template for incentive payments as long as it is mandatory for State and Territory governments to forward payments to local government for its outcomes. Local government is often in a far better position to drive sustainability outcomes in particular from residents and the business sector.

***How should payments be awarded under the Sustainability Charter?
Is it possible to measure cultural and social values in relation to a Sustainability Charter?***

Payments should be awarded to agencies that demonstrate real contributions to meeting the targets set for the 5 key elements. Contributions should be subject to a robust and transparent assessment using agreed milestones and/or KPIs.

Payments for cultural and social achievements would be essential in ensuring that the charter is truly about sustainability although measurement of these indicators may be more difficult than environmental indicators.

THE BUILT ENVIRONMENT***What objectives are applicable to the built environment?
How would these be measured?***

Objectives for the built environment must reflect whole of life cycle management and resources and use of products and materials that deliver sustainable outcomes through reduction in resource use.

Urban planning should reflect sustainability initiatives such as increased development along existing transport corridors and promotion of the use of public transport, walking and cycling. There should also be a focus on "in-fill" development to reduce pressure on agriculturally or naturally significant land as well as reducing costs associated with the construction of new infrastructure.

How should we rate the sustainability of existing building infrastructure?

Existing tools such as GreenStar and ABGR could be used. Clear measurable targets need to be developed and pursued for existing building stock. The reuse of existing building stock is an important factor in the sustainability of urban environments.

Transformation of existing building stock could be driven by the Commonwealth and State governments requiring the buildings they lease and own to meet a reasonable GreenStar and ABGR rating.

***Could a measurement of level of retro-fitting achieve this?
How would we measure levels of retro-fitting?***

Retro-fitting is very difficult to measure. For larger commercial buildings where development consent is required from local government there is an ability to impose requirements for retro-fitting and these can be recorded and measured.

For residential retro-fits and small businesses where it may be something as small as replacements of taps, toilets and showerheads there is no easily recordable method of measurement. Voluntary registers may be a way of obtaining some level of information.

Do we need to protect heritage buildings as part of the sustainability charter?

Yes, protection of culturally and/or historically significant buildings and places is an important element of social sustainability. Building reuse should be encouraged in order to retain these buildings and deliver new life to them.

Can existing building standards, such as the 5 star rating system, be incorporated into the Sustainability Charter?

Yes. These standards should be reviewed to ensure they are equal to those in countries that are achieving high sustainability targets. The Building Code of Australia should incorporate standards and codes that will allow for the targets to be achieved.

WATER

How should water quality be measured?

Existing measurement standards can be used for potable and recreational water quality. These include Australian Standards. The CSIRO should be consulted for the best method of measurement.

Should targets be focussed on reducing water consumption, increasing water reuse or both?

Both, with an emphasis on water consumption and water reuse. Consumption reduction targets should be set for industrial, commercial and residential land uses and improvements to the management of water supply particularly in old systems in urban areas.

Old infrastructure in urban areas results in huge losses of potable water through cracked pipes. Small amounts of investment in repairing infrastructure by water supply authorities could result in large saving in water loss and therefore long term a saving through not having to provide additional dams or other sources of water supply for potable water.

The City of Sydney is presently exploring a number of opportunities for reuse of water in order to reduce the consumption of potable water for things such as irrigation and cleaning.

How can we measure the health of water catchment areas?

There are various measures in existence that test for defined indicator contaminants in waterways. The CSIRO is best placed to provide advice on these.

ENERGY***How should we measure the use of renewable energy?***

Renewable energy use measurements can be sourced from energy suppliers. It should be reported as a percentage of total energy use and targets set for increasing this percentage. It is important that there are also targets for reducing total energy use and for increasing new renewable energy generation (determined by Green power definition). NEMMCO would likely be able to provide this information to the Inquiry.

How do we encourage an increase in the renewable energy use?

There are currently barriers to people using renewable energy; in essence there is a cost penalty for the choice to use renewable energy. The government should review methods such as investment in Research and Development, subsidies and tax allowances to encourage growth in the renewable energy market.

A detailed review of the supply of renewable power and international examples of market driven change should be examined and reported on.

Can we measure the awareness of the environmental, economic and social benefits of energy efficiency and renewable energy?

There are many ways this can be measured, through market research, sales figures of item types for example energy efficient light bulbs and energy bills that indicate changes in use.

TRANSPORT***How do we judge the efficiency of transport systems?******What transport infrastructure measures will reduce private transport needs?***

The reduction of private transport use is critical to the sustainability of cities. The costs of congestion, health and safety are growing as the reliance on the private vehicle grows.

Infrastructure measures that could reduce this dependence are;

- Increased density along major transport corridors
 - Increasing density can lead to positive impacts both in respect of changes to modal split by reducing the need to drive as populations are closer to transport infrastructure and reducing the extent of transport infrastructure needing to be provided to outlying areas. Further benefits result from the opportunity to integrate interchange facilities within the areas of increased density making the use of public

transport more easily accessible to a greater percentage of the population.

- Increased density in urban areas to ensure a concentrated demand for public transport
 - Public transport planning is driven by the demand. Concentrated populations create demand and can make the introduction of new infrastructure economically viable.
- Provision of public transport infrastructure for alternate modes such as cycling and walking at the early stages of development
 - Planning for infrastructure that promotes alternate modes of transport enables them to be provided as part of the initial works. This reduces costs through integrated construction with roads and housing or commercial developments. By planning ahead adequate corridors can be retained to ensure that alternate modes are able to be provided for and supported and integrated with existing systems including public transport.
- A clean, convenient, reliable and safe system that is fully integrated with land use planning
 - Where public transport systems are able to provide the above as basic elements they are more likely to be patronised by people as they provide a level of convenience that can equal a car. The service needs to be able to compete with car use in terms of timing. If a system is not convenient and reliable, people will turn to their cars which they see as having both those attributes.
 - Integration with land use planning has been addressed in a manner above through concentration of densities along transport corridors and provided for a concentrated demand.

The City of Sydney is concerned that the State and Federal governments do not consider that the provision of a high quality public transport system within the Sydney metropolitan area is an important driver in reducing dependence on the private motor car.

Adequate funding should be provided from both State and Federal governments for the upgrading of public transport in Sydney. As well as contributing to the environmental sustainability of the city, it is essential to its economic sustainability allowing people to travel more easily to work.

The City of Sydney has resolved to investigate the opportunity to extend the existing inner city light rail route into the CBD from Central Station along Castlereagh Street. The existing light rail, while being safe and reliable does not deliver people to where they need to go. They are currently forced to change to a different mode in order to reach the central areas of the city where employment is concentrated. The introduction of an extension will reduce the pressure on the existing road system and bus network by providing an alternative means of transport for people.

The City is currently reviewing the financial feasibility of the proposal.

Funding for these sorts of sustainable transport initiatives needs to be considered within the scope of the charter. Transport projects must be sustainable and provide benefits at the environmental, social and economic level. Funding from the

Commonwealth to the States for transport projects should focus on urban transport that will result in achieving benefits to the greatest areas of population.

The Charter should look at funding mechanisms from other countries where transport funding is dependant on sustainable outcomes such as improvement in air quality. Many inner city light rail and bus-way projects in the United States of America have been funded in this manner.

How do we measure these?

Through surveys such as journey to work and reporting on transport infrastructure built each year including public transport, roads, walking paths and cycleways. The measurement could be in dollars spent, travelling capacity or distance.

The role of the International Council for Local Environmental Initiatives (ICLEI) and the Cities for Climate Protection (CCP) should be recognised as providing tools and measurements that are common across local government in Australia and worldwide for energy, water and transport.