

7 December 2004

Sydney Metropolitan Strategy  
Department of Infrastructure, Planning and Natural Resources  
Metropolitan Strategy Team  
Via email: metrostrategy@dipnr.nsw.gov.au



**OCEANWATCH**

*FOR THE FUTURE OF OUR MARINE ENVIRONMENT*

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Dear Sydney Metropolitan Strategy Team

**Submission re: Metropolitan Strategy Discussion Paper: Sydney Greater Metropolitan Region**

This letter sets out the comments of Ocean Watch Australia Ltd (Ocean Watch) in relation to the Metropolitan Strategy Discussion Paper (the Strategy) for the Sydney greater metropolitan region. Ocean Watch is an environmental, non-government organisation sponsored by the commercial seafood industry to represent the environmental interests of industry with respect to protecting and restoring fish habitats, improving water quality and promoting sustainable fisheries.

**General Comments**

The Strategy provides a good starting point in planning for and responding to future growth and development in the Sydney greater metropolitan region. The following comments are made in the context of the planning frameworks within NSW and have, where possible considered planning reforms. There are however, a number of areas we believe that require further attention by the government in order to progress towards ecologically sustainable development and ensure that a holistic approach is taken to planning, in sympathy with the natural environment and within natural resource constraints for the greater metropolitan region. These include:

- **Aquatic habitat:** Any planning strategy proposed for the greater metropolitan region should require a no net loss to aquatic habitat policy that is enforced. This is paramount given that 60% of aquatic habitat and 90% of floodplain wetlands have already been lost across NSW, attributing to significant declines in fisheries production. Where habitat losses are inevitable, suitable trade-offs, as required under Part 7 of the *Fisheries Management Act 1994* should be identified to ensure overall river and ecosystem health does not deteriorate. There are many examples within the greater metropolitan region where policy decisions relating to large-scale developments have over-ruled this legislative obligation of the government. It is imperative that economic aspects of developers and the government and logistical difficulties are not favoured at the expense of environmental and social considerations of the community relating to aquatic habitat loss.

Additionally, appropriate areas should be identified and earmarked for future environmental rehabilitation so as to return environmental, economic and social benefits to the community. Rehabilitation projects of a large scale akin to Hexham Swamp Rehabilitation Project, which will see an estimated \$1.6M p.a. generated in fisheries production, should be recognised as State Significant and be given priority in the development approval process. Additionally, future infrastructure development needs to give better consideration to impacts on aquatic habitat, such as impacts on fish passage in the construction of road crossings etc in consultation with the Department of Primary Industries –Fisheries (DPI).

- **Water quality:** Any planning strategy for the greater metropolitan area needs to build in aspects to ensure no net deterioration of water quality across the region. The Hawkesbury River clearly shows significant signs of decline and poor health (as noted in *Meeting the challenges - Securing Sydney's water future: The Metropolitan Water Plan*) and cannot sustain any further deterioration in water quality from additional sewage treatment plants and rural and urban runoff exacerbated by additional water extraction from the river. Existing and future stormwater and sewage treatment needs to be of a higher level and opportunities for recycling maximised. There needs to be protection of receiving waters with retention of flood and buffer zones around creek lines. The priority to establishing water flows to this river that mimic natural environmental flows must be set higher. The timeframe for establishing water flows to the Hawkesbury following an assessment of the outcomes from the Nepean is too long. The Hawkesbury River should be tackled first!
- **Buffers:** Provision of adequate buffer zones for protection of aquatic habitat and water quality is critical for the maintenance of river health and thus the industries that depend on river health (e.g. fishing, tourism), together with the maintenance of the cultural and social values intrinsically related to river health. These buffers need to provide for the impacts of climate change, in particular sea level rise. Again it is anticipated that regional strategies and local environmental plans will provide for buffering. It is imperative however, that consistency is applied across regions and that inappropriate buffers are not imposed at the expense of continued loss of aquatic habitat and deterioration of water quality. Again, conditions imposed by DPI relating to buffers and environmental safeguards must be adhered to. There are again examples within the greater metropolitan region where economic values have over ruled the environmental and social aspects.

While the impacts of climate change cannot be clearly quantified, as a precautionary measure buffer zones should be reviewed to reflect any adjustments necessary and new release areas should be located outside buffers zones for coastal erosion and flooding hazards associated with climate change and sea level rise. Council planners should be provided with erosion and flood risk inundation maps to assist in this process.

- **Biodiversity:** The Strategy does not address protection of terrestrial or aquatic biodiversity within the context of grand scale development proposed to cater for the growing population pressure on the greater metropolitan region. There is no mention of the need to provide conservation corridors linking high conservation value areas, akin to the proposed “Green Corridor” for the Lower Hunter. These corridors are critical for the survival on native flora and fauna in the face of climate change. It is expected that regional planning strategies will identify these critical areas and that accordingly, local environment plans within local government areas will also factor these in. To ensure a holistic approach however, it is critical that these high conservation value corridors are identified within the overarching planning strategy for the greater metropolitan area to ensure conflicts do not arise across planning scales.

Together with the provision of biodiversity corridors, native and riparian vegetation policies need to be developed that afford adequate long-term protection for all significant native species and ecological communities. This will require the completion of comprehensive mapping of existing native vegetation in Sydney combined with an assessment of all publicly owned land in the region.

- **Cumulative impacts:** The Strategy does not adequately address the management of cumulative impacts across the State from proposed and existing development within the greater metropolitan region. A fundamental flaw within the planning framework for NSW is the failure to consider the cumulative environmental and social impacts arising from new developments. With the increased expansion of 1000 people a week to Sydney, the pressure on our natural resources, particularly water and the strains on social and environmental values increases. The consideration of cumulative impacts needs to extend outside of the greater metropolitan region to regional areas in terms of water quality (e.g. the impacts of deep ocean outfalls on regional communities through oceanic current impacts), air quality, water flows, fish production associated with the poor flushing of rivers and degraded wetlands and swamps. The Strategy should include a suitable method for identifying and managing cumulative impacts. Although this is unlikely to be an easy task, it is a critical one and should not be overlooked because it is in the “too hard basket”.
- **Aboriginal/indigenous heritage:** The Strategy does not refer to how Indigenous heritage will be recognised and preserved in the context of the new planning strategy. It is presumed that existing management regimes will continue. A key shortcoming presently is the failure to adequately incorporate indigenous knowledge of ecosystem processes and principals of natural resource management into government planning processes. This strategy provides a suitable forum with which to change the mindset and give adequate recognition of indigenous knowledge into the planning process where appropriate.
- **Amalgamation of existing plans:** The discussion paper does not clearly explain how this Strategy links with other regional and local plans such as the Catchment Action Plans and Local Environmental Plans (LEPs), many of which have only recently been revised, nor it is clear how inconsistencies between plans will be resolved, for example, zoning conflicts. With the planning reforms currently proposed and occurring within NSW, it is imperative that cost efficiencies are maximised and conflicts resolved to ensure that consistency is achieved between and within planning scales.

### Specific Comments on “Directions for Managing the Changing Region”

Ocean Watch makes the following comments on the actions/issues raised within the nine specified directions.

#### 1) *Plan for balanced growth within natural resource constraints*

For balanced growth to be achieved, it is imperative that high conservation value areas (including aquatic habitat) are identified, protected and connected; land suitable for agriculture retained; and remaining land is assessed for new release development only once infill development options are exhausted. Growth centres need to be located in areas that will have the least environmental impact. This will save the community future costs associated with environmental degradation and repair.

Ocean Watch supports some aspects of the *Meeting the Challenges Securing Sydney’s water future: The Metropolitan Water Plan*, in terms of the proposed adoption of the recommendations from the Hawkesbury Nepean Management Forum, price reforms, and initiatives such as the subsidised retrofit program etc. However, it must be emphasised that in order to move towards sustainable extraction and healthy rivers, we

need to maximise recycling opportunities for effluent and stormwater quickly (only 2% of water used is recycled) in combination with demand management options before considering augmentation of our water supply from potentially unsustainable energy intensive desalination methods, groundwater extraction or inter-valley transfers. We need to consider the mistakes that countries such as North America have made in the past with regard to adoption of these latter options, in particular groundwater extraction and the significant associated environmental costs. Additionally, improvements can be made to BASIX requirements as many local governments feel that there is room to explore further water savings for example through the installation of larger rainwater tanks etc. There is no doubt that the requirements for industry and councils to have water management plans may assist in building in improvements to BASIX.

## 2) *Strengthening the regions*

No comments

## 3) *Manage growth and value non-urban areas*

The priority actions states “*rural and agricultural lands, parks, forests and conservation areas will be valued and recognised, so that the trade-offs are clear*”. These rural areas and conservation areas need to be more than just “valued” and “recognised”, they need to be given priority for protection. Areas should be earmarked for rehabilitation as well. Only after all infill development options are exhausted should new areas should be considered for release.

New greenfield development directed at growth areas in the south west and north west of Sydney should not occur at the expense of destroying aquatic habitat and deteriorating river health. There should be no net loss of aquatic habitat, nor degradation of water quality considering the enormous losses already experienced in NSW and the subsequent decline in fisheries production.

A priority action proposed is “*the greater recognition is proposed for non-urban land so that it is not treated as land “in waiting” for urban development*”. With this said, Kurnell Peninsula and the Botany Bay precinct are examples where greater recognition is needed of the associated significant social, environmental and heritage values the community places on these areas and the impacts present land uses are having on these values. Sand mining should cease and the demise of the Botany Sand Aquifer halted. Sand mining is widely recognised as an unsustainable practice that has significantly degraded valuable groundwater dependent ecosystems of the RAMSAR listed Towra Point. Botany Bay has sustained considerable damage through large-scale developments and continued expansion of Port Botany will only see it further degradation. Again, consideration of the cumulative impacts of inappropriate land uses would identify the impacts these developments are having on ecosystems and related fish stocks in Botany Bay and in turn the impact this is having on components of the community such as commercial fishermen.

## 4) *Building livable new communities*

This should only occur after *Direction 5: Renew Existing Areas* is fully explored. Infill development should be a priority, using and improving existing infrastructure and preventing urban sprawl into ecological sensitive areas.

Any new developments should maximise opportunities for recycling effluent and stormwater that go beyond requirements of BASIX and maximise energy efficiency in their design. Incentives should be given to developers that achieve this. Additionally, all new developments should require native gardens.

New developments should strive to move away from the concreted streams that have occurred in the past, look towards softer options such as grass swales for guttering and aim to protect natural waterways, in particular receiving waters. Buffers to protect aquatic habitat (e.g. riparian vegetation) should be established together with buffers for coastal erosion and flooding risks previously mentioned and appropriate set-backs planned.

In addition to developers funding required infrastructure, developers should also be required to pay a contribution for trade-offs for environmental damage.

*5) Renew existing areas*

No comment

*6) Strengthen employment centres and precincts*

No comment

*7) Connect centres with the transport network*

*“The Ports Growth Plan” to provide direction for industry to accommodate growth in trade through NSW ports* should not do so at the expense of further degradation to Botany Bay or the Hunter River estuary. Any decisions for expansion should consider cumulative impacts to the aquatic environment and the flow on effects to the community.

*8) Target infrastructure*

Ocean Watch supports the priority action that *“new technologies or new ways of providing services need to be considered before building new and expensive infrastructure”*, more specifically that reuse and recycling options be considered before augmentation options such as energy intensive desalination plants. This priority action needs to be driven by long term sustainability, not a short term view to raising revenue.

*9) Use appropriate funding and governance arrangements*

Ocean Watch supports this direction, however would like to see higher development levies on developers directed towards environmental rehabilitation.

In terms of appropriate governance arrangements, there is a need to reduce the bureaucracy of government and reduce inefficiencies within agencies and work between agencies to achieve a more streamlined effective approach to planning. The NSW government needs to adopt a long-term view of managing our natural resources, in particular water reform, and needs to take into consideration the cumulative impacts of development and other activities.

**General**

Ocean Watch supports the general direction the strategy is heading, however recommends that the above issues and concerns raised be addressed for a more holistic integrated, sustainable plan for the future growth. It is imperative that any future development in Sydney does not exceed the region's carry capacity.

Please do not hesitate to contact me on (02) 9660 2262 should you require further information regarding these comments made.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AL', with a long horizontal line extending to the right.

Anissa Lawrence  
**Executive Officer**  
**Ocean Watch Australia Ltd**