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Submission: See attached

Dear Sir/Madam

I object to the continuation of the environmental levy on the following grounds:

**1. Levy introduced in 2004 by now should be mainstreamed within budget.**

The levy was introduced in 2004 for identified projects. It was continued in 2009 and 2014. In literature circulated for 2014 the following items were identified:

**Figure 2: Proposed project funding for Sustaining Our City, 2014 to 2019**

Proposed program	Budget 2014 - 2019
<b>Coastal protection</b> e.g. completion of Coastal Walkway, install street litter traps	\$6.85 million
<b>Energy saving</b> e.g. renewable energy at Council sites and parks, energy efficiency upgrades for Council buildings	\$4.6 million
<b>Water saving</b> e.g. stormwater harvesting and irrigation works	\$1.61 million
<b>Reduce greenhouse gas emissions</b> e.g. cycleway and pedestrian upgrades	\$2.5 million
<b>Resource conservation</b> e.g. investigate recycled materials for road and footpath upgrades	\$0.55 million
<b>Biodiversity</b> e.g. dune protection, street tree planting	\$1.8 million
<b>Community engagement and education</b> e.g. Eco-living Fair, school holiday programs, community food gardens	\$2.46 million
<b>Total</b>	\$20.37 million

Note: Administration activities including staff salaries and cost have been distributed throughout the proposed levy program.

Top of the list is Coastal Protection, however go to the Council website and this is what appears on Coastal - <https://www.randwick.nsw.gov.au/environment-and-sustainability/what-were-doing/coastal-and-marine> - as you can see there are no details of the works. They may exist but not easily accessed. Two years ago Botany Cemetery Trust submitted a proposal for an expansion into Bumborah Point. This is located on the Coastal Walk and subject to the Coastal Protection Act. There is no information on the project.

Water Quality on beaches is an issue which attracts attention yet there is no information on monitoring of waterways that drain various beaches or on performances from EPA licenced premises in the region, eg. Sydney Water WTP, Orora, Elgas, Origin, Vopak, DP World. Major works are required in partnership with State Government and details are required. Check out the webpage on water management <https://www.randwick.nsw.gov.au/environment-and-sustainability/what-were-doing/water-management> Again there are no details on specific projects and what are in the pipeline. Chifley Reserve is not on the page even though it is supposed to be maintained through stormwater harvesting <https://www.randwick.nsw.gov.au/facilities-and-recreation/sports-fields/list->

[of-sports-fields/chifley-sportsfields](#) - some of the money for that came from an Environmental Service Order against Huntsman, a Major Hazard Facility located on Denison Street in Bayside Council area. <http://laperouse.info/wordpress/wp-content/uploads/2011/03/hunts.jpg>

Biodiversity and Reducing/Mitigating greenhouse emissions are items from 2014 and current yet where is the evidence of a whole of Council approach to maintenance of vegetation and strategic re-vegetation (species type is critical), identifying potential habitat corridors and enhancing links eg. purchasing buffer land around industrial zone. Cycling is identified, however, should rightly be included within the integrated transport budget as active transport. Again, there are State and even Federal income sources which should be explored and should also be a high priority for Section 94 contributions. There is higher density developments in the pipeline and proposed particularly around the Light Rail terminuses and also the Anzac Parade corridor southwards yielding substantial S94 monies for such investment.

Resource conservation was listed in 2014, however, where is the evidence of progress toward the circular economy (a State Government policy - <https://engage.environment.nsw.gov.au/circular> Where is a simple initiative such as a repair café. 'Waste' policy at Randwick is focussed on large scale treatment rather than reduction and resource recovery and has minimal community outreach.

There is little information on the Coastal Walk <http://www.randwick.nsw.gov.au/facilities-and-recreation/explore-randwick-city/coastal-walkway> It is impossible to evaluate without the data and without data it is difficult to make a case to State Government for investment. Sections are not clearly identified. Is this an 'Environmental' project or a tourist investment? State Government investment is made elsewhere <https://www.smh.com.au/politics/nsw/nsw-s-national-parks-to-get-50-million-for-new-and-improved-tracks-20180608-p4zkc5.html> and the La Perouse section of the walk is through National Park as is Malabar.

Community engagement was listed as a separate item in 2014 and continues to be so. It needs to be incorporated into everything Council does as part of continuous improvement within the organisation and also to coalface activities eg. libraries, waste, parks and beach maintenance, water quality and compliance (eg. fatbergs and stormwater pollution).

## **2. Approval of Rate Increase by IPART in 2018 factored in removal in June 2019**

IPART approved the full rate variation proposed by Randwick last year. In its report <https://www.ipart.nsw.gov.au/files/49323922-2364-482c-9d83-9dd698075180/LG-Determination-Randwick-City-Councils-application-for-a-special-variation-for-2018-19.pdf> IPART made reference to the levy on pages 3, 13, 14, 16, 17, 19 when considering the increase. It based it's decision on a number of factors including the fact that the levy which had been approved on a 'temporary basis'(page 14) would be expiring in June 2019.

## **3. Consultation and governance**

Council has supported its application to IPART with results from 'consultation'. It undertook

- in person sessions:

*Approximately 15 residents attended the three information sessions which were designed to inform residents about the Environmental Levy; what it has funded over the past 15 years, what it will continue to fund and how the levy will impact on their rates. Page 18*

- mailed surveys to ratepayers: approx. 10% response with 54% to 46% in favour and variation depending on suburb
- conducted a telephone survey to residents: with higher number in favour
- exhibition on website and submissions with 40% in favour:

*In total 163 submissions were received. Of these submissions, 85% were received through Council's Your Say Randwick consultation website, 15% were via email and 1% through letters (note: percentages do not add up to 100% due to rounding). All submissions received were accepted. Submissions may have come from ratepayers, businesses, community groups and renters. Some people may have lodged a submission as well as completing the ratepayer survey. Of the 163 submissions received, 66 were in favour of continuing the levy and 93 did not want to continue the levy.*

IPART is charged with assessing the application on its merits, which is not dissimilar to what is required of the Department of Planning and Environment when assessing development applications i.e. the proponent's proposal (EIS) is placed on exhibition for comment and the evidence is assessed on its merits.

A major piece of evidence produced by Council (the proponent) is the Consultation Report. From the 'consultation' Council has assumed the majority of ratepayers in Randwick are in favour of paying higher rates, in this case labelled an 'environmental levy'. In the survey material (both written and telephone) the levy is presented as 25cents a day, a seemingly small amount.

*Let's face it, what can 25 cents buy you today? Not much you say... well what if just 25 cents a day opened up new areas of the coastline for you and your family to explore, provided lush tree canopies in parks and streets, and helped clean your beaches? (signed by Mayor)*

Anyone arguing against such a small amount when it is for the 'good of the environment', is 'obviously anti-environment'. There is additional 'persuasion' when 'threats' are made suggesting that 'worthy' projects may not happen if the levy is not continued. Cuts and efficiencies elsewhere are not considered because the items are considered in isolation:

*Discontinuing the levy means we'll have to reprioritise our works programs – this means some of the environmental programs we've been delivering won't continue while others will take longer or result in other works programs not happening.*

Top of the survey list are water quality initiatives (see below). The obvious question is why investment in stormwater harvesting coupled with irrigation of council reserves would not be a mainstream budget priority, particularly when it also attracts State Government investment as well. Another question is why spend ratepayer money on projects that are clearly under State Government jurisdiction, eg. a walkway in Malabar Headland National Park, long-term lease on a Museum in Kamay Botany Bay National Park (identified in last year's rate rise). Why talk about 'lush tree canopies' yet promote a project such as the Light Rail when 744 trees were identified for removal in the 2013 EIS (more in the 2014 Modification). This was a Council promoted project, a very visibly promoted project until public sentiment turned against it and then in an act of gross hypocrisy signs (paid for by ratepayers) were erected along Alison Parade opposing the loss of trees. Why alienate part of a major park (inconsistent with its Plan of Management) and contribute

\$3million of ratepayer money to an NRL club if the environment is a priority -  
<https://www.smh.com.au/sport/nrl/south-sydney-s-centre-of-excellence-at-heffron-park-finally-gets-approval-20180508-p4ze2i.html> (note the comment).

Page 5 of the booklet sent to all ratepayers (at cost unknown)  
<https://www.ipart.nsw.gov.au/files/1a2cf533-bfdb-454a-a857-cc2aaba2159d/Attachment-19-20-21-and-23-Community-Engagement-Materials.pdf>

## Proposed projects 2019-2024

**If the Environmental Levy continues, it will fund the following projects:**

<b>Coastal</b> <b>\$9m</b>	<p><b>Coastal Walkway</b> Working towards a continuous Coastal Walkway from Clovelly to La Perouse. Funds will help design and implement walkways at South Coogee, Lurline Bay, Randwick Golf Course, The Coast Golf Course and St Michael's Golf Course.</p> <p><b>Gross Pollutant traps</b> Installation of five additional pollutant traps to increase water quality at local beaches.</p>
<b>Water</b> <b>\$6m</b>	<p><b>Saving water</b> Future proofing wastewater re-use program at Maroubra Beach, Des Renford Leisure Centre, Purcell Park Matraville, Nagle Park Maroubra and Pioneers Park Malabar.</p>
<b>Other</b> <b>\$620k</b>	<p><b>Reducing waste and consumption of natural resources</b> Continuation of Council's Compost Revolution, Switch your thinking on Plastics and other Green events.</p>
<b>Energy</b> <b>\$2.36m</b>	<p><b>Energy efficiency program</b> Energy efficiency program for Council building upgrades, community renewable energy, smart monitoring and carbon offset program.</p>
<b>Greenhouse</b> <b>\$3.1m</b>	<p><b>Solar power, composting, electric vehicles and cycleways</b> Installation of solar panels on five Council buildings, increased rates of composting, installation of public electric vehicle charging locations and funding for improved cycleways.</p>
<b>Biodiversity</b> <b>\$1.12m</b>	<p><b>Green Corridor program</b> Planting more native trees in streets and parks, continuing Native Havens program and additional flora and fauna monitoring and WIRES relocation and interpretive centre.</p>
<b>Food</b> <b>\$500k</b>	<p><b>Sustainable food</b> Funding support for eight community gardens and 22 school food gardens.</p>
<b>Education</b> <b>\$2.2m</b>	<p><b>Sustainability events and workshops</b> Continuation of Council's Eco-Living Expo, Earth Hour, World Environment Day, Best Gift Markets, NOX Night Sculpture Walk, Marine and Coastal School Holiday Activities, school grants, Eco Heroes program, sustainable schools exchange and workshops at Randwick Community Centre, Barrett House and libraries.</p>
<b>Total</b> <b>\$24.9m</b>	<p><small>Note: Administration activities including staff salaries and costs have been distributed throughout the proposed levy program.</small></p>

contains a list of projects to be funded under the levy. There are events that could be community - driven and run at lower cost. What makes a Night Sculpture Walk 'environmental'? Why 'school grants' when this is a State Government responsibility. Why does World Environment Day cost money surely the point is to de-commercialize? Why libraries when there is already a funded Library



network. Don't Saving Water programs have a 'pay-off' timeframe, so what is it. Metrics on attendance is expressed as 'visitations' and not 'visitors' which exaggerates the outreach. Where are the metrics on the Coastal Walk?

#### 5.4. Results – Importance of proposed projects

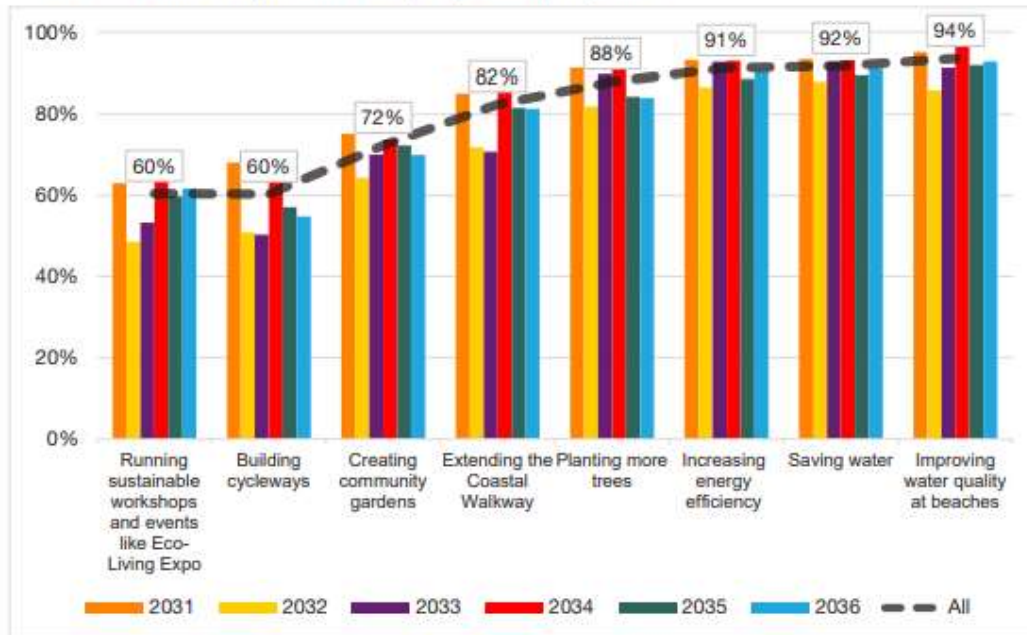
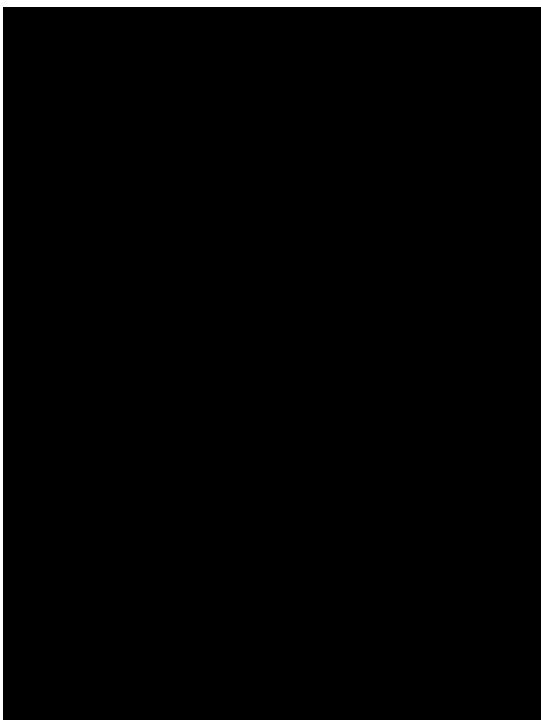


Chart: Importance of proposed Environmental Levy projects by postcode.

It is notable that a clear majority who provided submissions were against continuing the levy unlike the 'surveys' carefully designed in 'marketing speak' to produce a positive response for the 'proponent'.

Within the Planning regime, would survey material from a highly resourced proponent outweigh evidence provided through submissions as well as analysis of material by the departmental staff? I



can understand people saying yes to the levy survey, particularly when they are not paying, but even when they are. It's packaged as an 'environmental good' costing only '25cents' a day. What's there to disagree with. However, it was a levy and it was 'temporary' (page 14 IPART report 2018). Twenty years is not 'temporary'. It should have been mainstreamed before now and the Council budget framed according to priorities. The Environment is not something to be afforded 'after everything else'. The Coastal Walk is a capital works item. It should have its own Plan of Management with staged works and clearly communicated. Part of the walkway is through two State National Parks and it services tourists from all over Sydney, as well as interstate and overseas. There is no reason why ratepayers of Randwick should carry the entire burden. Water quality and stormwater management is managed at local and State level with

the largest Wastewater Treatment Plant in the Southern Hemisphere located in Randwick City. To suggest Randwick goes it alone under the Environment Levy is equally absurd and doesn't reflect recent projects eg. Malabar with Council and Sydney Water, and recently agreed Coogee works announced by State Government. In the case of the latter, last Sunday the Opposition Labor spoke person, Mr Minns, committed, if elected, \$7 million, from State funds to a Coogee 'stormwater solution' (photo above L-R candidate for Coogee, Chris Minns, Mayor Randwick). Stormwater harvested water reduces demand for and commensurate cost of drinking water and likewise investment in solar and wind energy reduces cost of electricity. These are long-term investment items which have a payback timeframe. Most of the rest could be mainstreamed into 'community services'. An overhaul of 'community servicing' is long overdue. Some residents enjoy the benefit of 'community centres' within a 30- minute walk and others within a similar distance only having access to Council Centres. Active Transport(cycleways) routes, as discussed before, could be appropriately funded from S.94 contributions.

Finally, and as suggested earlier, this proposal needs to be assessed on merit not on marketing expertise. Planning aspires to 'robustness, accountability and transparency'. I would argue that what Council (the proponent) has presented to IPART has not passed that test.