

2025 consultation

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To whom it may concern,

Resilient Sydney submission – Net Zero Commission Consultation

Resilient Sydney welcomes the opportunity to provide this submission to the NSW Net Zero Commission consultation paper.

Resilient Sydney is a collaboration of the 33 councils of Greater Sydney working to create a more resilient city. On 29 April 2025, the new Resilient Sydney Strategy 2025-2030 was launched. The Strategy is informed by extensive community and key partner feedback involving more than 2,000 individuals and 200 organisations. Resilient Sydney also commissioned an updated Greater Sydney Resilience Risk Assessment to inform the Strategy. The risk assessment coupled with stakeholder and community concerns has informed priority actions in our Strategy to be delivered in collaboration to address the key resilience challenges for Greater Sydney.

The climate change impacts outlined below make it imperative that State government work with stakeholders and all levels of government to strengthen our collective response on climate change mitigation and adaptation.

Climate change impacts

The risk assessment undertaken to inform the Resilient Sydney Strategy confirms that climate change is driving increased extreme weather events for our region and putting pressure on the natural environments that our communities value.

Community engagement undertaken by Resilient Sydney to inform the Resilient Sydney Strategy 2025-2030 confirms that the community views climate change as one of the top 6 regional stresses for our region. This is aligned with the risk assessment in which heatwaves, bushfires, flooding, storms and coastal hazards were all identified in the natural hazards category, as top shocks for Sydney. Our natural hazard shocks have cascading and compounding impacts linked to other identified shocks such as critical infrastructure failure (energy, transport, digital networks, waste, waste and shelter).

RESILIENT SYDNEY

A program for metropolitan Sydney to survive, adapt and thrive in the face of chronic stresses and acute shocks. The Resilient Sydney Office is funded by local government and hosted by the City of Sydney.

www.resilientsydney.com.au

RESILIENT CITIES NETWORK

Resilient Cities Network is a urban resilience network to build safe and equitable cities for all.

www.resilientcitiesnetwork.org

The stresses identified in our strategy also increase the vulnerability and exposure of key parts of our communities to natural hazard shock events. Greater Sydney's councils and our diverse communities are experiencing significant financial, health and well-being and social impacts from successive events including drought, bushfires, flooding and increasing frequency and severity of heatwaves.

Greater Sydney was directly impacted by the 2019-2020 bushfires with fires burning on all edges of our city. More than 60% of the Greater Blue Mountains World Heritage area was affected. Bushfire smoke has led to significant public health impacts, including excess mortality attributed to smoke-related pollution, as well as thousands of emergency department presentations and cardiovascular and respiratory hospital admissions.

In 2022, flooding impacted more than 15 local government areas across Greater Sydney that were subsequently declared disaster zones. Greater Sydney's 5.5 million residents are exposed to heat every summer, and this exposure is increasing as our population grows and climate change drives more frequent and severe heat events.

As identified in the [Greater Sydney Heat Smart City Plan](#) we know:

- energy use triples on days 35 degrees Celsius and above
- exceptional heat events have been found to drive a 13% rise in mortality
- domestic violence rises 50% when temperatures rise from 20 degrees to 40 degrees Celsius
- in Western Sydney alone, total costs from heatwaves are estimated to be \$1.4 billion per year and growing.

More frequent and intense rainfall events, flooding and heatwaves are testing the capacity and resilience of assets and city-wide systems such as stormwater and flood mitigation infrastructure, the electricity network, transport and health services. We are seeing an increased need for greening and cool zones including demand for Council facilities, such as pools and libraries, to be used by communities seeking shelter from heatwaves and extreme weather.

The impacts of extreme weather events are not experienced equally across communities. Our priority populations including culturally and linguistically diverse communities, older people, youth, and people with disability experience heightened effects of extreme heat due to higher rates of preexisting chronic health conditions and reduced access to, or not being able to afford air conditioning. Renters face systemic barriers to implementing effective cooling measures in their homes, unlike homeowners or business owners who typically have greater control over their living environments.

Homes and businesses within the Northern Beaches, Sutherland Shire, and Eastern Suburbs are being impacted by sea level rise and storm inundation.

First Nations and climate action

The Resilient Sydney Strategy 2025-2030 highlights the importance of adopting a Caring for Country approach, and elevating First Nations voices in decision-making. Resilient Sydney encourages the Commission to consider and promote innovative initiatives being explored by some local governments including carbon credits that support Aboriginal people and communities, and cultural burns in the State to reduce the risk of wildfire and consequent emissions.

Recommendation

- Consider how the State Government can support emerging initiatives presented to the Commission, such as carbon credit programs that benefit Aboriginal people and communities, and the revitalisation and application of cultural fire practices

Place-based data to enable net zero action and investment.

Sydney's councils need standard, accessible place-based data to inform investment cases and interventions that advance State's net zero ambitions in their communities. Two thirds of Sydney's councils have now set net zero targets for their LGAs and are progressively endorsing and implementing localised net zero action and investment plans to deliver more efficient buildings, electrification programs, collaborative renewables procurement and greening initiatives that reduce emissions across our region.

To effectively support the NSW Government's net zero targets, it is essential that councils are equipped with baseline data and practical tools for place-based net zero community plans, linked to NSW policies. By providing this foundational support, State government enables local councils to focus their limited resources on areas within their control, including setting local strategies and investing in people and programs that drive on-the-ground implementation of net zero initiatives.

Partnering and leveraging existing networks is efficient for government to drive net zero action; it is disappointing that the State Government ceased funding (30 June 2025) for the Net Zero App which provided a consistent set of projections aligned to State government policies for Greater Sydney decision makers to develop locally relevant evidence-based policies and plans. City of Parramatta, Blacktown City Council, Sutherland Shire Council, and Blue Mountains City Council were the most recent councils using the App to develop and endorse evidence based locally relevant Net Zero Plans for their LGAs.

The Global Protocol for Community-scale Greenhouse Gas Emission Inventories (GPC) provides two approaches to developing community emissions reporting inventories, a "territorial" approach and a "city-induced" (consumption based) approach. The "city-induced" approach focuses on how business and residential activity and consumption within a defined geographic boundary leads to an increase or reduction in greenhouse gas emissions. For local governments engaging their community in climate mitigation efforts, this reporting method best highlights community opportunities to reduce emissions.

Resilient Sydney has worked extensively to increase local council access to place-based datasets for our region with the Resilient Sydney data Platform. We look to the State government to collaborate, develop and share datasets where place-based data is either unavailable or needs to be evolved, in particular for commercial waste and residential travel.

Recommendations

- Support the Resilient Sydney data platform, and fund tools and resources to councils that provide consistent city-induced/ consumption inventories and projections aligned to State Government policy settings for councils to develop and deliver locally relevant net zero plans
- Support development of a centralised battery storage dataset with annual reporting to track progress against the State's target for 1 million NSW households and small businesses to have access to rooftop solar and battery systems by 2035
- Develop and report annually on a place-based commercial waste dataset for Greater Sydney and its regions using the GPC 'city induced' inventory method to enable

- Sydney and its LGAs to understand the emissions footprint of this sector in their area and support efforts to reduce impact
- Significantly increase the sample size for the State's Household Travel Survey dataset from its current small sample size for Sydney, to give decision makers better insights into emissions from residential travel at LGA geographies

Electricity and energy sector

NSW Government's Net Zero Plan 2022 update identified that Greater Sydney alone is responsible for 38% of NSW's greenhouse gas emissions.

Electrification is a critical step towards energy resilience and net zero and needs to be accelerated along with efficiency upgrades, access to local renewables and smart load management to enable sustainable grid outcomes and affordable electricity for our community.

From a resilience perspective, it is essential that the ongoing energy transition delivers an equitable and affordable energy system that empowers and benefits communities across Greater Sydney. There is a need for a coherent narrative and support for communities navigating the energy transition to ensure that the transition is equitable for all in our community, including vulnerable communities, renters and people living in apartments.

Resilient Sydney advocates for Greater Sydney to become a Renewable Energy Zone, in line with the report released by the Committee for Sydney in June 2025. Smart, local energy management with local solar and storage is essential to ensure we are not building renewable transmission infrastructure that we do not need. Sydney must do its part in the renewable energy transition; buildings and electric cars are becoming part of our electricity grid and we need coordination and collaboration to support a future-proofed grid that delivers the benefits and flexibility of a renewable powered energy system.

Local councils have a strong understanding of the residential and business communities in their LGAs, and their feedback and deep knowledge of their communities and effective implementation pathways need to be better reflected in the design of many State government funding programs and policy. When local councils provide guidance and advice that is then not adopted in State grant funding schemes or program design, it is our communities who are miss out. Genuine co-design processes that capture and embed local advice would significantly improve the effectiveness and success of government programs and grant provisions.

Globally recognised efficiency ratings and policy settings such as the National Australian Built Environment Rating System (NABERS) and the Commercial Building Disclosure for the commercial office sector have made Australia's office building stock amongst the most efficient in the world. For residential buildings, a nationally consistent rating tool and mandatory disclosure for homes would result in more efficient homes which cost significantly less to run. Federal and State government can play a role to reduce upfront costs to build better performing buildings.

Recommendations

- Proactively engage with local councils and integrate their knowledge and advice into the design and implementation of State Government energy programs and funding. This collaboration is essential to ensure the effective, coherent, and equitable delivery of energy-related transition opportunities to residents and businesses across Greater Sydney

- Set specific emissions reduction and net zero targets for Greater Sydney and work with Sydney's local councils to deliver evidence based and equitable action towards LGA and metro wide targets
- Introduce statewide consistent electrification provisions and regulations in the NSW planning framework for a managed and consistent transition away from fossil fuels
- Identify and communicate ways in which buildings can operate as large-scale storage, by load shifting and demand flexibility that shifts energy demand to the middle of the day
- Support the expansion of mandatory disclosure in all NABERS sectors and ensure residential disclosure includes apartment buildings (common area/base building and apartments)
- Expand minimum rental standards to include minimum energy efficiency and climate resilience measures
- Establish Sydney as a Renewable Energy Zone, and confirm a State Government agency to convene an Urban Renewable Energy Roundtable of key stakeholders that progresses this proposal to increase equity of access to locally generated energy

Transport

As utility-scale and rooftop solar continue to increase the share of renewable energy in the State's electricity grid, transport emissions are becoming an increasing proportion of NSW's overall emissions footprint. Emissions from this sector continue to rise, highlighting the urgent need for increased focus and coordinated action. The significant work by NSW Government to provide incentives and support to increase the transition to electric vehicles is to be commended. Continued investment, strategic guidance and public awareness campaigns are essential to accelerate this transition and ensure long-term impact.

Further action is needed to ensure equitable access to sustainable transport options for all of Sydney's residents, workers, and visitors. This includes expanding access to walking, cycling, and public transport infrastructure. State Government funding needs to be increased to meet local government demand to increase active transport infrastructure, with only fifth of the 320 council applications to the State receiving funding in the most recent funding round.

There is an absence of clear and consistently reported progress metrics to track Greater Sydney rates of cycling, walking and delivery of active transport infrastructure, including completion of the identified strategic cycleway corridors. Establishing transparent reporting mechanisms is critical to monitor progress, guide investment, and build public trust in the transition to a more sustainable and inclusive transport system.

Recommendations

- Continue support for electric vehicle transition and co-design grant funding and guidance with local councils
- Accelerate rollout of zero emissions buses
- Increase the sample size of the Household Travel Survey to provide a more granular and robust evidence base on residential travel and mode-share
- Increase funding to accelerate completion of Sydney's strategic cycleway corridors and walking connections to public transport hubs
- Develop indicators and report annually against these metrics on progress for active walking and cycling mode share and delivery of the strategic cycleway corridors for Greater Sydney

Waste

As emissions from the electricity sector decline, waste will constitute an increasingly significant share of Greater Sydney's emissions footprint. Addressing this challenge requires greater focus and sustained support from the NSW Government.

There is a pressing need for the State government to lead in building social licence for lower-carbon alternatives in waste treatment. Innovative solutions and new ways of managing waste and material flows, including Energy from Waste and black soldier fly larvae waste processing require a coherent, government-led narrative that communicates the environmental and economic case for doing things differently. There is also an opportunity for State Government communications channels to raise awareness around opportunities to reduce waste in the first place for example campaigns that respond to NSW Waste and Sustainable Materials Strategy 2041 findings that only 8% of available food from supermarkets is donated. A pilot with OzHarvest and Woolworths showed that training staff to identify more food for redistribution led to a 37% increase in donations.

NSW Government is responsible for ensuring that waste infrastructure and services are strategically planned to meet the needs of households and businesses, but this responsibility is not embedded in NSW planning.

In light of the contribution of waste to NSW and Greater Sydney emissions, it is imperative that NSW Government introduce legislative reform that recognises and embeds State Government responsibility to deliver long term waste infrastructure strategic plans and recognises waste as an essential service. Such governance reform would enhance visibility and capacity to manage emissions from waste, aligning with best practices already established in other jurisdictions, such as Victoria.

Councils have communicated that they would welcome State-led consistent guidance on the emissions impacts of different waste treatment or management approaches, and emissions related to the transporting of waste. To address this, the State Government should commission and disseminate consistent, evidence-based analysis and advisory guidance to support informed decision-making at the local level.

Recommendations

- NSW Government to lead a clear narrative around Greater Sydney's waste needs and opportunities for lower emissions solutions, communicating the safety, sustainability, resilience and community benefits of emerging solutions, including Energy from Waste
- Develop and report annually on place-based commercial waste data for Greater Sydney and its regions using the GPC 'city induced' inventory method to enable Sydney and its LGAs to understand the emissions footprint of this sector and support local efforts to reduce the emissions contribution of this sector
- Commission and publish guidance and advisory notes around the emissions calculation methodologies and benefits of waste management processes and approaches.

Adapting to a changing climate

Shocks and stresses have significantly impacted Greater Sydney over the past 5 years depleting our resilience. Local government is fundamentally under-resourced to deliver on the NSW Government's climate adaptation objectives. Climate change and population growth will increase the impacts from disasters relating to natural hazards and NSW needs to adapt now to reduce exposure and vulnerability to climate change. This will require new ways of working and improved coordination across government and non-government

sectors. The Resilient Sydney Strategy 2025-2030 includes 30 actions to strengthen resilience across Greater Sydney.

Recommendations

- Improve State government coordination for adaptation responses and mechanisms by formalising cross- agency and local government collaborations to avoid duplication and improve efficiency
- Provide longer-term funding aligned to councils' Integrated Planning and Reporting cycles, enabling proactive planning, integration with core council business, and delivery of sustained climate adaptation and mitigation outcomes
- Develop and publish annually metrics that track adaptation measures and their effectiveness to reduce impact on communities
- Provide data and build capacity and useability of hazard and climate projections data for local councils, including NARClIM data for local government systems, planning processes and policy development
- Work with local councils to develop regional prioritisation plans for asset renewal and adaptation pathways
- Confirm an agency and provide resourcing for State Government to coordinate and convene stakeholders to support delivery of Greater Sydney's Heat Smart City Plan with clear roles, responsibilities and delivery mechanisms that aligns work across the three tiers of government and non-government sectors
- Continue to resource state government collection and provision of Greater Sydney canopy cover data in the long term
- Increase greening along proposed and existing active transport routes to create active transport routes to create shade and encourage their use.

The need to accelerate action on net zero and adapt to our changing climate is urgent. In order to do this, we need to partner, collaborate and coordinate action to be efficient, realise opportunities and scale beneficial outcomes. Resilient Sydney is ready to partner with the NSW Government to deliver outcomes that benefit our communities and our region.

If you would like to speak with a Council officer about this submission to the Net Zero Commission consultation, please contact [REDACTED], Program Manager on [REDACTED] or at [REDACTED].

Yours sincerely



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