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SUBMISSION ON THE

STATE SUSTAINABILITY STRATEGY FOR WESTERN AUSTRALIA

CONSULTATION PAPER



Prepared by the City of Gosnells, April 2002

Thank you for the opportunity to comment on the development of the State Sustainability Strategy. This submission has been prepared and lodged by the City of Gosnells.

The City of Gosnells regards the pursuit of sustainability as crucial to a bright future. It is keen to provide input into the development of the strategy and to work with the State Government, other local governments and the community to provide for sustainable development and governance that leads to a more secure and equitable future.

The City of Gosnells has demonstrated its capacity to consult with, and respond to, its community and to addressing priority issues of concern to the community. Our community has indicated that issues of crime and safety, environmental quality and economic and social decline must be addressed as the City moves into the twenty-first century.

The City has also demonstrated its capacity to work with the State Government, most notably in the context of its award-winning *Revitalisation of Gosnells Town Centre Scheme*. Experience gained in this process will provide guidance towards sustainable interactions, particularly between State and local governments.

Regional partnerships are recognised as efficient frameworks within which to develop and implement sustainability strategies. The City of Gosnells works with its regional partners on catchment management and greenhouse gas reduction projects.

The City of Gosnells strongly supports the development of the State Sustainability Strategy and provides input to a number of key issues raised in the consultation paper with a focus on issues critically relevant to local government.

It is essential that State Government's role in facilitating a sustainable future for WA includes the provision of resources, capacity building and technical support to assist local government integrate sustainability principles into its decision-making processes.

The City of Gosnells understands that there will be further opportunities for local government to provide input into the development of the State Sustainability Strategy through workshops expected to be held by the Western Australian Local Government Association in mid March 2002. The City of Gosnells is keen to contribute to the development of the strategy and provide further input following the outcomes of the workshops.

The City of Gosnells is well advanced in promoting sustainable development, is very keen to place on the record its desire to act as a State/local government model in operationalising sustainability principles and delivering sustainable outcomes.

APPROACHING SUSTAINABILITY FROM THE LOCAL GOVERNMENT PERSPECTIVE

1.0 Social Sustainability: General Comments

For social sustainability to be in itself, sustainable, it is vital for all the stakeholders within a community to decide what they want to *value* as sustainable. External standards of what is valued as sustainable may not meet with agreement from a local community perspective. Thus, if external standards of sustainability are placed onto a community, rather than being developed with a community, there is a real risk of these standards being placed on a *community shelf* rather than placed within how a community functions.

A major component to the success of sustainability is to recognise and arrange action on the absolute premise that no two communities are the same and that the ‘one size fits all’ approach will not work and is doomed to be a waste of resources, time and funding. To ensure real outcomes and ongoing results, that are in themselves sustainable, the approach to triple bottom line operations must be based in the celebration of the diversity of community types rather than the tribulations of the assortment of community types. For it is the diversity of community types that will in the end allow for true sustainability to occur and outlive those that are committed to its implementation.

The definition of social sustainability needs to include the social community as a whole and not just a component of a community such as the socially disadvantaged, low-income earners etc. Social cohesion within a community is about the *whole* not its *parts*. Thus, through an inclusion model of community, social sustainability can grow its own strengths, future and interdependent links to economic and environmental sustainability through the community’s self management and self reliance. Social sustainability will only become sustainable and ongoing if a community itself is enabled to choose and direct its own social sustainability standards.

For social sustainability to become a living thing, service providers and social institutions must move away from defining communities and parts within a community and instead view communities as a whole unit. Service providers must move from the philosophy of “*what can we provide for you to be a community member*” to “*what can we provide in conjunction with you to ensure that you will continue to be a community member.*” This philosophy can then be expanded to community groups and communities of interest within a larger community.

Social sustainability has its basis in community institutions, norms and values and these vary immensely. Unless these are acknowledged and the variations included in planning for sustainability as a whole concept, no amount of governance, laws or government strategic plans will ensure sustainability.

Emphasis must be given to creating social meeting places for community identity to evolve. This is especially important in an increasingly globalised and homogenised world. The importance of a unique sense of place must be highlighted in a world where capital is increasingly footloose. Sustainability as concept and local identity can be used to address these issues.

As a community grows and changes, flexibility must be included within the sustainability standards to ensure social cohesion of the whole community. If social sustainability standards to be achieved are fixed and rigid, then the community does not have an ongoing life of its own and sustainability becomes a product rather than a way of being. If social sustainability is viewed as a product, there is the associated risk that products have a shelf life with an out of date clause where as ways of being have an ongoing life of their own.

2.0 Partnerships for Sustainability

- 2.1 Engagement of business, as outlined in the consultation paper, seems to focus on large business as large-scale users of resources. The partnerships listed in the document do not seem to provide an avenue for small business representation or a strategy to inform and educate small business about sustainability. The majority of West Australians work in small business. This sector of the economy needs to be heavily involved to actually access the majority of economic activity.
- 2.2 Western Australian Municipal Association, now Western Australian Local Government Association, is listed as a partner. What role will local government play? Local government has economic, environmental and social responsibilities. There is a need to ensure that local government participation is balanced. Perth Economic Development Forum is a group of local government Economic Development professionals that meets to address common issues that affect Perth metropolitan area. Whilst this is not a formal group it does represent a link between local government and the general business community. Their input to the strategy would be useful.
- 2.3 Local government is ideally positioned to investigate, design and initiate social sustainability and the associated standards of what composes and is involved within social sustainability and how these areas of sustainability interact with the environmental and economic components of sustainability.

Local governments already have connections to the local community through the numerous services and programmes they provide for the community at a local level. These are as basic as the association with the community through booking a local football field or community hall to the approval of major Outline Development Plans for the development of new suburbs. Some local governments also have a history of providing services and programmes in partnerships with other service providers from a community, state and federal level. Thus there is already a blueprint of social sustainability practices within the operations of some local governments.

The State Government must recognise that local government can:

- Act as a conduit between external agencies and the internal community members.
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- Provide community audits of the services available already within a community and link these together to ensure that there is not a duplication of services and that lack of service provision is identified.
 - Draw together the three principles of sustainability into community life through the way it operates itself.
 - Provide social audits of communities and their social structures.
 - Facilitate and provide local solutions for local issues.
 - Provide linkages into local communities of interest.
 - Provide linkages from State and Federal Government service providers to the local community.
- 2.4 There is a real risk, that if those in charge of progressing the mantle of sustainability hold back its implementation until the blueprints are picture perfect, then the implementation of the concepts of sustainability may not occur at all. There is a need to trial the notions of sustainability within an actual community setting to test the concepts. Local governments, if committed to the principles of sustainability in their true sense, can provide such an environment for this trial at a local level. There is also a need to identify current practices that can be classified as examples of social sustainable service provision with a view to analyse their true outcomes for the community and in the provision of social sustainable practices. This information could then be used to develop like foundations for future coordination of systems within other communities.
- 2.5 Local government has many decision-making powers and mandates that other agencies and groups do not have. This provides for local government to be recognised as having a very significant role in achieving sustainability.
- 2.6 There is a need to re-emphasise the value of partnerships and the necessity to provide frameworks that encourage private-public sector partnerships.
- 2.7 There is also a need to re-think concepts relating to integration. Government has a key role in identifying these linkages and facilitating appropriate agreements. The State Government's Industrial Waste Exchange programme provides a good example of synergistic exploitation - what is one company's waste may be another's raw material.

3.0 Institutional arrangements and structure

- 3.1 The City of Gosnells recognises the division of responsibilities between national, state and local governments, and the imperative for partnerships between such bodies to achieve positive outcomes. The City also acknowledges that such division of responsibilities currently has greater potential to work against, rather than for, decision-making to produce sustainable outcomes.
- 3.2 A more pragmatic approach must be taken to the division of responsibilities. Strong formal partnership links must also be established between the three layers of government, with formal structures established to facilitate integrated decision-making, joint policy development and planning and service provision.
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Where responsibilities are devolved, appropriate resourcing must accompany.

- 3.3 Similarly, the structure of national, state and local governments requires change in order to better address the issue of sustainability, and to embed the principle in the organisations' paradigms.

Significant Government and Agency structural change must be considered if the sustainability principle is to be correctly addressed both now and into the future.

- 3.4 All governments and their agencies, in progressing Western Australia towards a sustainable future, must be aligned in terms of policy, governance and decision making. Adequate resourcing must be provided to support such change.

- 3.5 Local government provides an obvious and ideal vehicle for the delivery of many local sustainability initiatives. Integration across the variety of local governments, and between the sometimes-disparate areas of operation within those organisations presents a challenge to the consistent delivery of immediate and long-term sustainable outcomes.

A number of local governments have made significant inroads in this matter, but it remains a potential block to achieving fully integrated sustainable development. Local government must be supported, and where appropriate resourced, to address this barrier to sustainability.

- 3.6 The full engagement of the community in decision-making is an essential element of the holistic approach that is sustainability. A number of local governments have achieved degrees of success in this area, but it is acknowledged as an area where there is room for improvement. Support from the State Government in this area is considered appropriate, and would assist State and local governments to achieve consistency in engaging the community.

- 3.7 Governments must also beware of consultation fatigue, which has the potential to work against sustainability decision-making and initiatives.

- 3.8 The State Government's promotion of sustainable behaviour, growth and development, to become mainstream, requires fundamental and embedded change to institutions and decision-making processes.

4.0 Economic Issues

- 4.1 The dominance of economics distorts interpretation of the global and local picture. The State Government must give consideration to addressing the predominance of economics in the reality of sustainability promotion.

- 4.2 Governments must demonstrate leadership. Investment in ethical investment funds provides much-needed capital for sustainability initiatives. The State Government should provide leadership in directing its investments towards such funds, and in so doing provide impetus for others to do so.
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- 4.3 Financial and other support must be provided to equitable community economic development initiatives and investments.
- 4.4 Support must be provided to local enterprises that are sustainable, employ local people and use locally produced goods and services. Local governments require support to attract local industry, and to propagate the “business incubator” concept.
- 4.5 Further to the previously mentioned issue of developing localities that are places of choice to live, work and recreate, these must be accompanied by incentives (either inherent or created) to invest.
- 4.6 Financial and other assistance to local government from State and Federal Governments to promote sustainable economic development is very limited. The vast majority of Federal Government funding is aimed at regional, non-metropolitan areas. This focus purely on the regions and ignoring of metropolitan areas is unsustainable.
- 4.7 With regard to renewable energy, funding is biased towards small scale (not profitable) and large scale projects. The medium scale, which is where local government is most likely to be able to intervene, has limited funding opportunities. This needs to be further investigated.

5.0 Environmental Issues

- 5.1 The State’s attention is drawn to numerous local government initiatives under the banner of the Cities for Climate Protection programme to reduce greenhouse gas emissions. The State Government is urged to engage proactively with local governments to reduce greenhouse gas emissions from the community, commercial and industrial sectors.
 - 5.2 Dependence on non-renewable resources must be minimised. Incentives to achieve this end must be considered. Cycle networks must be promoted and their use encouraged. The use of public transport must be promoted. Disincentives to single-occupant vehicle travel must be considered.
 - 5.3 Recognising that changes to the Building Codes of Australia are imminent, the City of Gosnells urges the State Government to take a further step and mandate energy efficiency standards for residential and commercial buildings.
 - 5.4 The State Government must demonstrate leadership in promoting and utilising greenhouse-friendly alternative fuels.
 - 5.5 The State Government is congratulated on the establishment of the Sustainable Energy Development Office.
 - 5.6 The City of Gosnells supports a coordinated approach by the State Government to waste management, with sustainable management through emerging technologies as a core principle. The City reiterates the need for a greater role in waste management by State Government.
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6.0 Planning for Sustainability

- 6.1 The State Sustainability Strategy should highlight the importance of appropriate planning to achieve sustainable development. Planning must be holistic and incorporate the social, environmental and economic aspects of an area. Outline Development Plans or local guided schemes need to factor in sustainability issues as an integral requirement with explicit rationalisations for proposed land uses and urban design arrangements.
- 6.2 The State Government must consider introducing statutory provisions for the linking of transport, services, commerce and residential development along sustainable lines. The application of the Livable Neighbourhoods Code must be progressed from its current “optional” status. The recently advertised review of this planning tool provides an opportunity for this consideration. Consideration must be given to making this code mandatory.
- 6.3 Lot orientation and size, transport planning, designing out crime, facilitating mixed-use areas, providing commercial and community foci are essential elements of good urban design that contribute to sustainability and must be promoted, if not mandated.
- 6.4 The State Government’s *Bush Forever* policy document is regarded as a very proactive planning tool for biodiversity conservation. It is essential that complementary and sympathetic planning be developed for urban developments abutting and in proximity to these areas. They offer an unprecedented opportunity to provide sustainable biodiversity conservation in an urban setting. Current ad hoc approaches to development associated with *Bush Forever* sites fail to take full advantage of the potential offered future urban communities.

The City of Gosnells wishes to stress, though, that the inequitable approach taken by the State Government with regard to local government “land bank” investments identified as Bush Forever sites creates an unwarranted additional financial burden on the local government and, by corollary, its community. At a time when capacity and resourcing are being raised as obstacles to be overcome by local governments in the move towards providing sustainable outcomes for their communities, this evident inequity must be addressed. The State Government must engage in dialogue with local government to identify ways of lessening this financial imposition.

- 6.5 Social sustainability issues have presented definitional problems for planning authorities. In this regard Council notes the Western Australian Council of Social Services initiative in the development of social sustainability indicators and sees this as a promising methodology for operationalising a planning response at the local level. This reinforces and provides a further example of the critical need for appropriate partnerships previously referred to in this submission.
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- 6.6 It must also be recognised that planning is not solely about statutory controls. Planning focus but must be broadened to stimulate shifts in developer culture. The message that planned sustainable communities can, and do, sell must be got across to those ultimately responsible for implementation.

7.0 Strategic Programmes and Tools

- 7.1 The State Government is encouraged, through the State Sustainability Strategy, to look seriously at supporting the implementation of the Local Agenda 21 (or similar Ecologically Sustainable Development) framework across the local government spectrum. LA21 potentially expands the scope of local environmental planning, and guides the integration of local government planning and policy-making, whilst involving all sectors of the community in decision-making. A focus is placed on long-term outcomes.

South Australia has had a partnership for Local Agenda 21 between the State and local governments since 1995. Equally, the Queensland and Tasmanian Governments are both presently considering the introduction of ESD requirements for councils. The Victorian Government is also examining the introduction of an ESD Commissioner for Victoria.

The South Australian Partnership for LA21, whilst a commendable State and local government partnership, suffered from a lack of statutory mandate, which has negatively impacted the programme's long term stability and continuity. Amendments to the South Australian Local Government Act 1999, though, now incorporate Ecologically Sustainable Development (ESD), strategic planning and public consultation provisions. This is regarded as a positive step that should be considered for Western Australia to embed long term commitment to sustainability, regardless of changes in governments.

- 7.2 State of the Environment (SoE) is an essential tool for measuring success against sustainability objectives. This tool should also be widely promoted within local government under the State Sustainability Strategy.

The New South Wales Local Government Act was amended in 1997 to include ESD principles, with Councils required to prepare Local Environment Plans, State of the Environment Reports, and demonstrate resourcing of environmental works. Whilst this model has resourcing constraints and does not necessarily go beyond environmental assessment to sustainability criteria, it has proved a powerful stimulus for national local government debate, the development of ESD frameworks and their effective implementation in councils across Australia.

8.0 Local Planning Strategies and Processes

- 8.1 It is essential in promoting sustainable development that local governments develop long-term planning strategies addressing particular land uses and setting appropriate development guidelines with the strong support of State Government agencies. Sustainable development must occur within a proper framework,

avoiding ad-hoc development with limited reference to the long-term objectives for an area.

- 8.2 Growth boundaries, implicit in landuse intensification/consolidation initiatives and controversial from a landowner and political perspective, must also be considered as a tool to sustainably managing growth. Growth boundaries must be allied to transport strategies. Continued uncontrolled urban sprawl and a consequent reliance on private transport moves us further away from a sustainable position. An opportunity to consider the issue of growth boundaries exists with the current development of the WA Planning Commission's *Future Perth*.
 - 8.3 The role of the community in planning must be enhanced.
 - 8.4 Local government has a role in the assessment of development applications. Where environmental impacts or issues are identified, such applications are referred to relevant State Government agencies such as the Department of Environmental Protection and Water and Rivers Commission. Moving on to sustainability assessment, it will be essential that local government has sufficient capacity and resources to perform this function. Consistency at all levels of government will be required.
 - 8.5 Subdivisional (land) approval conditions are recommended by local government and must be endorsed by the Department for Planning and Infrastructure with advice from respective State Government agencies such as the Department of Environmental Protection and the Water and Rivers Commission. Local government has long taken issue with the non-endorsement, in some cases, by the Department of Environmental Protection/WA Planning Commission of such conditions, particularly with regard to environmental conditions. This issue requires the State Government's consideration in the pursuit of sustainability.
 - 8.6 The City's attempts to promote higher densities around proposed local and district centres in new urban areas (eg Canning Vale) in line with approved Outline Development Plans is often frustrated by developer resistance. Here the promoted argument is that the market wants a certain type of residential development, ie family oriented housing on larger lots. This is despite demographic changes relating to household structure and reflects a conservative bias within the development industry. Introduction of maximum lot sizes within planning instruments such as the R Codes and local schemes would be a significant step forward and would facilitate delivery of a greater range of housing types outside of the inner Metropolitan area.
 - 8.7 A similar developer reluctance to embrace more sustainable development outcomes is evident with respect to drainage strategies for new urban areas. Typically the development industry proposes centrally located, landscaped, permanent water bodies as a marketing tool and means of "nutrient stripping" stormwater product. The industry has been reluctant to take up more sustainable drainage strategies such as the "Living Streams" approach. Formal endorsement
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of policy position by lead state agencies in this regard is indicated as a matter of some urgency.

- 8.8 Recognition of the economic drivers for development is seen as necessary to facilitate sustainable outcomes in the built form and land use arrangements. Provision of incentives such as possible density bonuses or the fast tracking of approvals are seen as necessary.
- 8.9 Further, compliance enforcement is a relatively under-resourced aspect of local government's planning role. It would be expected that compliance with conditions relating to sustainable development would place additional demand on local government's enforcement capacity. The need for adequate compliance reporting must be balanced with community education, awareness raising and consequent cultural change with regard to sustainability as a whole of society responsibility.
- 8.10 There is a need to incentivise sustainable urban development. The WA Planning Commission has a role in this area. Economic levers must be introduced, as the WA market is not mature enough to decide in favour of sustainability.
- 8.11 Attention must be paid to removing uncertainty and choice in planning processes/guides (eg R-codes vs. Livable Neighbourhoods), as economic imperatives will always tend to override the socio-environmental aspects.
- 8.12 The lifestyle and community benefits of denser, more sustainable urban development must be "sold" to a sceptical population.
- 8.13 Should we investigate maximum rather than minimum standards in traffic engineering and subdivision guidelines?
- 8.14 Essentially, local government urgently needs legislative assistance from the State Government to bring about sustainable urban development, re-development and governance of our Cities.

9.0 Holistic Statutory Planning

- 9.1 The current statutory planning process does not generally incorporate sustainability measures into the assessment of proposed developments. Development proposals are, in the main, considered on a 'case by case' basis, which provides limited opportunity to consider broader issues associated with long-term sustainability.
 - 9.2 Current "sustainability" assessment extends only to the *Planning Legislation Amendment Bill (1998)* which requires all Town Planning Scheme amendments, including rezonings, to be referred to the Department of Environmental Protection. This provides the opportunity for the assessment by the Environmental Protection Authority of environmental sustainability only. This process is only available for Town Planning Scheme amendments. Most development proposals, though, may not require rezonings and are not
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significant enough as individual proposals to be referred through this process. There is a need for a holistic mechanism for the joined-up assessment of social, environmental and economic impacts/issues, ie sustainability assessment.

- 9.3 There is a need to consider possible processes for the assessment of the sustainability of major development proposals. There are currently no statutory requirements for local government to assess the sustainability of development and building applications. Many Australian local governments have attempted to overcome this inadequacy by preparing Sustainability Plans based on the approach outlined in Local Agenda 21. The Sustainability Plan sets the local government's requirements for addressing sustainable development based on local values. Development of an overarching planning framework in the format of a Statement of Planning policy would be beneficial. This should address general principles with requisite local policy providing specific operational detail relevant to the local context.

10.0 Funding and resources

- 10.1 The devolution of what are, or should be, Federal and State Government responsibilities to local government, Regional Councils and community organisations has been a consistent trend in recent years. It is rare that this increased responsibility is supported by ongoing financial assistance, capacity building and technical support.

Additional to effectively servicing its growing core responsibilities, the acceptance by local government, without adequate resourcing, of new responsibilities, must be regarded as unsustainable.

It is essential that State Government's role in facilitating a sustainable future for WA includes the provision of resources, capacity building and technical support to assist local government integrate sustainability principles into its decision-making processes.

- 10.2 Consideration needs to be given to long term resourcing of local government sustainability initiatives/responsibilities. Although local government has a responsibility to promote changes that are in the broader community interest, sustainable development may not necessarily be seen as core business. Even for those Councils that demonstrate a commitment to adopt such initiatives, there is a general reliance on external funding to initiate these new programs. This source of funding tends to be limited and of a short-term nature and therefore Councils may be reluctant to introduce new programs that are going to lead to ongoing financial commitment.

11.0 Procurement

- 11.1 "Green" procurement by government is acknowledged as an effective means of stimulating the waste management and recycling industry. A coordinated approach to green procurement across all levels of government is required.
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It is strongly suggested that local government be included, or given the opportunity to become involved, in any green purchasing agreements that the State government negotiates. Similarly, green procurement policy should be a matter for shared input and implementation. A consistent approach is essential.

12.0 Barriers

The State Government is reminded that barriers exist to the development of sustainable cities, communities and behaviours. These barriers must be quantified and qualified in order that they may be considered in the delivery of the sustainability concept, message and processes.

Barriers include:

- Perceptual and behavioural, including the lack of a catalytic personality, the media's presentation of information, disjunction between verbal support and willingness to take action, inertia of the built environment, and time horizons and conflicting interests
- Institutional and structural, including inappropriate structural framework of government, both political and institutional and weak diversity among those in the decision-making arena
- Economic, financial and market
- National, State and local government issues

13.0 Concluding notes

For the idea of sustainability to be perpetuated, we must look to history. The historical record reveals that the most powerful concepts have given rise to built outcomes. It is at this level that communities can grasp a concept's underlying principles. The State Government, in considering the long-term implementation of sustainability principles, must look to developing landmark projects, backed and facilitated by sound policies and frameworks.

The City of Gosnells strongly supports the development of the State Government's Sustainability Strategy, and is ready and willing to actively participate in progressing its own, and the State Government's sustainability agenda. The City reiterates its alacrity to place on record its desire to act as a State/local government model in delivering sustainable community outcomes.
