

Enquiries Trina Anderson (9345 8700)

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Professor Peter Newman
Director, Sustainability Policy Unit
Policy Office
Department of the Premier and Cabinet
15th Floor, 197 St Georges Tce
PERTH WA 6000

Dear Professor Newman,

STATE SUSTAINABILITY STRATEGY SUBMISSION

Further to the currently advertised "Focus on the Future: Opportunities for Sustainability in Western Australia", the City of Stirling would like to make the following submission.

- The City generally supports and agrees with the broad principles of the State Sustainability Strategy, which is seen as ensuring a better future for Western Australians. It is assumed that mechanisms to implement the State Sustainability Strategy will occur through specific strategies, for example the State Housing Strategy, the State Greenhouse Strategy, Perth's Air Quality Management Plan etc, and the City will comment on such strategies as advertised.
- There is a lack of representation of planning bodies or authorities in the 'Partnerships' or 'Stakeholder' groups. This appears to be an oversight, given the extensive influence this particular sector has on areas such as transport, land use planning and development, built form etc. The role of town planning needs to be clearly identified into the sustainability agenda.
- The 'Sustainability Strategy' identifies social issues as being perhaps some of the most immediate and dominant' ('Global and Local Sustainability issues'), however there seems to be a lack of representation of community groups with interest in these social issues within the 'Partnership' or 'Stakeholder' groups, particularly those covering social sectors and issues of the community. Additionally small business organisations, builders and developers should have representation in these groups.
- There seems a strong focus in the Strategy on environmental issues, rather than a balance between these and the social and related economic issues facing Western Australia, though these are identified in the background statements. It should be emphasised the Sustainability Strategy is not just an environment focused strategy.
- The statement is made in the 'Foreword' that "*Sustainability offers a process whereby these goals can be achieved simultaneously without tradeoffs or compromise*". The City considers this to be a prohibitive goal, considering the complexity of much of the decision making process will require some form of compromise and this should be

recognised. It also does not recognise the conflicts which frequently exist between environmental, social and economic objectives.

- It would be anticipated that an overarching (at a State and local authority level) integrated assessment process would need to be developed and implemented to achieve the principles of the Strategy (for example through the stated 'Major Projects Approval process').
- There needs to be an identification of suitable sustainability indicators and assessment criteria in order to provide clear assessment guidelines and benchmarks by which to review the success of the Strategy. The incorporation of these criteria into relevant policies is absolutely essential, especially to support the legal decision making process and planning authorities in their decision making capabilities.
- Clear direction to Local Government by State Government is required to implement consistent, across the board sustainability initiatives within their local communities, and a common Local Agenda 21 framework. There appears to be a reluctance for local authorities to enter into a LA21 program where there is no standard framework, confusion over the aims of such a program and unpredicted outcomes.
- It is suggested that strong leadership will be needed in implementing the Strategy through actions at a State level to achieve its principles. For example, implementation of green purchasing policies, a 'sustainable' assessment procedure for major developments and response to local government initiatives and strategies that compliment the State Strategy should be encouraged (for example the City's Glendalough Station Precinct Study adopted in 1999 that seeks to intensify land uses around the train station which has received little support at a state level).

In summary, the City believes the State Sustainability Strategy to be a worthwhile document which, if pro-actively implemented, will guide the creation of "a better future for all Western Australians" (particularly future generations). The City will independently continue to investigate mechanisms available to support its implementation at a local level, but reiterates the value of strong leadership, commitment and consistency at a State level across political timeframes and boundaries, for successful implementation of this important document.

Should you have any further enquiries regarding this matter please contact Trina Anderson at the City's Planning Services Department on **9345 8700**.

Yours sincerely,

Remo Formato
SENIOR STRATEGIES PLANNER