Coastal Planning Coalition

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30 April 2002

Professor Peter Newman
Director, Sustainability Policy Unit
Policy Office
Department of Premier and Cabinet

Dear Professor Newman

Please find attached the Coastal Planning Coalition's (CPC) submission on the Government's proposed State Sustainability Strategy.

The Strategy has the potential to be an outstanding achievement of the Gallop Government. However, members of the community will be looking to judge the effectiveness of its implementation. To provide a clear indication of the Government's progress it is recommended that sustainability principles and assessment be incorporated into all aspects of WA legislation.

The CPC commends the Government on its sustainability initiative, and looks forward to further contributing to this essential strategy.

Yours sincerely

Andrew Sullivan, Spokesperson
COASTAL PLANNING COALITION

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Submission on the proposed State Sustainability Strategy

The coastline is clearly of profound importance to Western Australians. Our coast is distinguished by its natural beauty and its relatively unspoilt character. However, it is a complex and fragile environment that is subject to dynamic natural processes which are compounded by unrestrained development pressures. The coast's fragility necessitates careful and responsible protection. The development of a sustainability policy for our coast is a matter of great urgency.

About the Coastal Planning Coalition

The Coastal Planning Coalition (CPC) is an affiliation of community groups with a specific interest in coastal planning and development issues. The CPC includes affiliates from groups campaigning against inappropriate development proposals at locations including: Smiths Beach, Maud's Landing (Ningaloo), Moore River, Breton Bay, Lancelin, Leighton Beach, Port Catherine (Cockburn), Gnarabup, Roebuck Bay (West Kimberley), Oakajee, Jervoise Bay (Kwinana), Peel Harvey Estuary, Rottnest Island and others. Representation from broader interest groups includes the Conservation Council of WA, Environs Kimberley and the Australian Marine Conservation Society WA.

CPC's Objectives

To seek a fundamental change to coastal planning and management in Western Australia, including the cessation of the existing speculator-driven development approvals process. A new planning regime is needed that delivers a legally-binding, holistic, scientifically informed, and environmentally sustainable planning and management system. This must protect the inherently fragile coastal zone and reflect the high cultural significance placed on all coastal areas by the majority of Western Australians.

Background

The CPC was formed in January 2001 by a number of coastal community groups in response to the Court Government's release of the draft Coastal Zone Management Policy. Subsequently the CPC has tackled the existing flaws in the planning process. Invariably a failure to apply sustainability assessment criteria to development proposals has led to poor decision-making by previous governments.

The CPC's common objective is to lobby for, and act to create reform of coastal planning and management practices in Western Australia to maintain the assets of the coast for a sustainable future.

It is common sense that if no agency has specific responsibility for something as important as the coast, inevitably it will be damaged. However, for some reason, successive governments from both sides of politics have failed to provide policies and processes to enable proper protection and management of coastal environments.

Our community objective is to provide planning information and networking support to local coastal groups. The CPC is not a lobbyist for individual local coastal issues, which remain the responsibility of affiliated groups.

The CPC recognises the current coastal planning system is not working and urgent fundamental change to planning in the coastal zone is needed at a legislative level to enact positive change for communities at a local level to ensure sustainability is a key part of coastal planning and management.

Definition of Sustainability

The CPC commends the Gallop Government on its commitment to sustainability and its guiding principles. The CPC is highly supportive of the Government's definition of sustainability:

> *Sustainability is the simultaneous achievement of environmental, economic and social goals.*

Need for Sustainability Assessment

In the coastal context it needs to be recognised that a healthy coastal environment is a necessary precondition for the achieving of economic, social and spiritual goals. Given the degree of development pressure on the WA coastline there is an urgent need to subject development proposals to comprehensive sustainability assessment. It is possible that such an assessment could be made by enhancing the present structure of arrangements used for decision-making relating to coastal planning.

Sustainability assessment must provide a process whereby environmental, social, economic and spiritual goals can be achieved simultaneously without trade-offs or compromise. Coastal planning and management must be consistent with the Government's election commitment of ensuring "integrated" decision-making. This means that Government decisions would fully consider environmental social and spiritual dimensions, as well as the traditional economic concerns, thereby achieving outcomes that are successful for all aspects of the sustainability quadruple bottom line.

Principles of Sustainability

The guiding principles of sustainability are:

- Conservation and enhancement of biological diversity and ecological integrity, including the essential maintenance of ecological processes and life-support systems;
- The precautionary principle;
- Inter and intra-generational equity;
- To enhance individual and community well-being and welfare by following a path of economic development that safeguards the welfare of future generations; and
- Improved resource valuation, pricing and incentive mechanisms to protect and repair the environment.

Sustainability is not an anti-growth concept, rather it is a concept that brings a new qualitative dimension to growth.

Required actions

- Sustainability principles must be established in specific material (enabling) legislation, in the objects of existing legislation or within specific coastal planning legislation.
- With specific reference to the coastal zone, decision-making authorities with responsibility for sustainability assessment, must apply and document the use of coastal capability assessment.
- Require assessment of demonstrable public benefit for all development in coastal zone
- Community interests seldom relate to any level of pecuniary interest, yet community groups are invariably challenging those with massive financial stakes. The sustainability assessment process must redress this problem.

Cumulative Impact Assessment

Development proposals are at the core of economic growth. For this reason the sustainability assessment process must include a proposal based Environmental Impact Assessment (EIA) process and a Cumulative Impact Assessment (CIA) process. CIA can be defined as:

"the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions…Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

NEPA (1969).

Western Australia has a relatively good EIA process, however the process is deficient in that it cannot properly consider the complexity of CIA. Coastal planning decisions need to take full account of the inter-relationships and inter-actions between specified environmental factors. For this reason it is appropriate that the planning approach to CIA be adopted. This methodology extends beyond the scientific approach to EIA, by building on the analytical functions of information collection, analysis and interpretation to also include value setting, multi-goal orientation and decision-making. As such a planning approach to CIA uses general planning principles and procedures. Ultimately the process leads to an order of preferences among a set of resource allocation choices. The process is only considered valid when it has inspired and incorporated a wide range of community responses.

The seven steps to CIA can be summarised as follows:

(1) Set goals;

(2) Establish spatial and temporal boundaries;

(3) Establish the environmental baseline;

(4) Define impact factors;

(5) Identify threshold values;

(6) Analyse the impacts of proposals and their alternatives; and

(7) Establish monitoring processes and procedures.

Clark (1994).

The California Coastal Commission's Regional Cumulative Assessment Project (ReCAP) provides a useful model for the consideration of cumulative impacts. ReCAP evaluates the implementation of California's California Coastal Management Program (CCMP) in addressing cumulative impacts. The ReCAP methodology follows five general steps:

(1) assess on a regional basis the cumulative impacts of development on the coastal environment;

(2) analyse major factors contributing to the identified environmental issues;

(3) project possible future impacts given existing trends;

(4) review the implementation of key land use and Coastal Act policies and procedures; and

(5) make recommendations to respond to the regional cumulative problems identified.

Required actions

- Legislative amendments should be made to enable the Environmental Impact Assessment process to fully consider Cumulative Impact Assessment.
- Many small applications are considered too insignificant to be assessed, but collectively they result in a significant impact on the environment.
- That legislative amendments ensure that Environmental Impact Assessment be developed beyond its present role of mitigating the problems associated with individual proposals to ensuring that all proposals are considered in the context of potential cumulative impacts.

Applying the Precautionary Approach

Wherever there is a risk of a development degrading or diminishing environmental values, and there is a lack of knowledge, insufficient knowledge, or uncertainty about the potential impacts and management of the impacts, such as on coastal environments, the Precautionary Principle (Approach) should be used as a tool to underpin decision-making. According to Deville and Harding (1997), in deciding whether or not to apply the Precautionary Principle in a given situation, the critical considerations are as follows.

(a) Identifying the threats to the environment from the proposal (including cumulative impacts) There are three classes to consider - threats that are known, threats that cannot be determined or quantified because of lack of knowledge, and threats that we are not aware may exist because we may not yet be aware that what we do not know may be important in the long term (epistemological threats).

(b) Identifying the seriousness of threats. This should consider all aspects of the threats to determine their significance, including spatial scale, magnitude of impacts, value of the threatened environment , temporal scale of possible impacts, interconnectedness of the impacts of the activity, cumulative impacts in the regional (ecosystem type) area and manageability, including knowledge specific to and essential for the environmental management of the coastal area.

(c) Establishing whether the threats are reversible or irreversible and over what time frames, allowing for major climatic changes and perturbations that have the potential to impede rehabilitation of the coastal area.

(d) Examining the likelihood of the threats occurring (estimates of risk) and certainty about the threats to the environment; and finally

(e) Where there is reasonable scientific certainty and a high degree of confidence about the threats, establishing the most appropriate preventative measures that should be applied.

A proposal involving a high degree of threat to an area of high environmental significance with low level of knowledge of how to manage the potential impacts would be unlikely to be found environmentally acceptable. Significant threats to the environment, even when supported by a high degree of scientific certainty, would also be likely to militate against a proposal being found to be environmentally acceptable.

Adapted from:

EPA Position Statement No 4

Deville, A. & Harding, R., (1997) Applying the Precautionary Principle: The Federations Press, 79 pp.

Given the ecological fragility of the WA coast the Precautionary Principle should be applied to all aspects of coastal planning.

Coastal capability assessment using geo-spatial analysis

The State Government should make freely available to all interested stakeholders metadata sets held by WALIS and other government agencies, for GIS analysis. Such data sets include environmental, policy, planning, geological, cadastral, native title, atmospheric, pollution, impact monitoring and other GIS datasets. This data will assist all memebers of the community engage in coastal capability assessment.

State Agreement Acts

The future use of State Agreement Acts would be incompatible with the principles of sustainability and sustainability assessment. In the 21st Century it is highly inappropriate, and contrary to the principles of sustainability, that some proposals could be considered exempt from other aspects of WA legislation.

Ecological footprints – a means of assessing Western Australia's progress towards sustainability

Background

Exactly how far are we from a sustainable future? To help respond to this question Canadians Mathis Wackernagel and William Rees developed the idea of the Ecological Footprint (EF) as a means of quantifying our impact on the planet. EFs enable comparisons to be made between different nations, cities and individuals. EFs are a useful tool to communicate how sustainable our lifestyles are and to measure our progress towards a sustainable future.

Concept

Ecological footprint (EF) calculations aim to quantify the true cost of our lifestyles. Categories of human consumption such as food, housing, transport, consumer goods and services, energy, agriculture for food supply and forestry are translated into the areas of productive land required to provide resources and assimilate waste products.

The last Western Australian *State of the Environment R*eport points out the link between population and consumption and the need for a reduction in our individual and collective impacts on the environment. The Report calls for the development of indicators to measure these impacts and suggests the use of the ecological footprint model.

The resources we consume and the wastes we generate can be expressed in an area (hectare) figure. Presenting figures in *per capita* terms enables comparisons between nations and states to be made.

Ultimately EF ratings can be used to determine the planet's carrying capacity, and monitor the equitable use of the world's resources. The Gallop Government could seek to develop a WA EF rating, from which our progress towards an ecologically, socially and economically sustainable society could be measured.

Australians presently have an EF rating of 9.0 hectares per capita, which is second only to the United States at 10.3 hectares per capita.

Ecological Footprint calculations for WA

The ecological benchmark.

Calculation spreadsheet
Some of the key elements of EF calculations are:

Home Energy rating
Home dwelling density
Fuel Efficiency
Kilometres Driven per Year
Use of Public Transport
Ride Sharing
Air Travel
Proportion of Locally Grown Food
Food Intake levels
Food Waste
Amount of animal-based products

A more detailed discussion of the issues raised in this briefing note is available at:
http://www.ecouncil.ac.cr/rio/focus/report/english/footprint/

Ecological Footprints as a means of benchmarking our progress towards sustainability

The *State of the Environment Report* highlighted the need for us to implement strategies based on the finite nature of many of our resources and of the capacities of the ecosystem to absorb our wastes. Western Australia cannot remain prosperous in the long term if we continue to use global resources at unsustainable rates and dispose of our wastes in a way that will undermine health and affect the functioning of the ecosystem.

EFs will enable us to gage our progress towards ecologically sustainable development. The calculation of a per capita 'footprint' for WA, and of a corresponding 'carrying capacity' would be a useful exercise. We could then judge over time whether or not we

are meeting the desirable criteria of decreasing our footprint and increasing our carrying capacity.

Conclusion

The Strategy has the potential to be an outstanding achievement of the Gallop Government. However, members of the community will be looking to judge the effectiveness of its implementation. To provide a clear indication of the Government's progress it is recommended that sustainability principles and assessment be incorporated into all aspects of WA legislation.

The CPC congratulates the Gallop Government on endeavouring to lead WA to a sustainable future and urges the Government to stand firm against those who may feel their short term interests will be threatened.