

STATE SUSTAINABILITY STRATEGY SUBMISSION

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Prepared for: **Department of Premier and Cabinet**

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SUMMARY

The following submission has been prepared and endorsed by the Australian Association of Planning Consultants (WA) following critical appraisal of the draft State Sustainability Strategy. It is a clear and contemporary document, ambitious and comprehensive in its overall vision.

The recommendations listed below summarise the main points of our submission and are asserted on the basis that their inclusion will result in a more complete and robust document and make a significant contribution to its successful implementation:

- ***Include the following as distinct areas of examination in the document:***
 - ***Urban design, subdivision and land development process,***
 - ***The role and relationship of the State Planning Strategy,***
 - ***Revitalising rural settlements, country towns and regional centres, and***
 - ***Legislative context and reform.***
- ***Evaluate and prioritise all proposed action***
- ***Compile a realistic & effective implementation programme***
- ***Expand the range of implementation mechanisms***
- ***There is a need for simple assessment processes to avoid delays in application assessment and approval lead times***
- ***Integrate administrative structures & procedures rather than adding to them***
- ***Ensure that sustainability assessment results in a change of emphasis, not a new industry***
- ***Ensure that sustainability assessment indicators have the capacity to achieve net sustainability gains.***
- ***Include AAPC representation on the Industry-Government Working Group on Sustainability Assessment***
- ***Allocate sufficient and appropriate resources for effective implementation of the Strategy***
- ***Acknowledge the State Planning Strategy as a key implementation mechanism for the Strategy***
- ***Place greater emphasis on sustainability measures for country towns and regional centres***
- ***Examine opportunities for housing on all government redevelopment sites within the metropolitan regional areas.***
- ***Develop agreed principles on what constitutes sustainable development in relation to urban form.***

1.0 INTRODUCTION

This submission is made on behalf of the Australian Association of Planning Consultants (WA), which comprises thirty two professional urban and regional planning firms and individuals providing consultancy services to the private sector and government agencies at all levels throughout Western Australia, other States and overseas.

All members of the Association are members of the Planning Institute of Australia (PIA) and, collectively, have extensive experience in the development, application and review of government policy initiatives, related to land use, urban design and development in metropolitan and rural contexts. The Association appreciates the opportunity to provide input to the State Sustainability Strategy - a contemporary document that is intended to provide the framework for a sustainable future for the State of Western Australia and its citizens.

This submission has been compiled in liaison with PIA (WA) and is focussed on areas of specific interest to members, acknowledging that a Sustainability Strategy for Western Australia is needed, an extensive amount of work has been undertaken to produce the draft document and that additional comments at this point should provide practical assistance to enhance, refine and complete the document.

2.0 THE FRAMEWORK

The draft Strategy is an ambitious and comprehensive project, wide ranging in scope and detailed in many areas of application. The framework consists of eleven principles, six long-term visions and goals and forty-two priority areas for action. There is evidence that input has been sought from a wide cross section of State Government agencies, Local Government and several specific interest groups and businesses.

The structure of the framework is clear and logical, conveniently illustrated in poster form at the back of the document. However, there is some inconsistency in the extent to which each of the priority areas have been covered and the extensive array of proposed actions, ranging from the specific to very general, do not give a clear indication as to what level the Strategy is pitched:

- The subdivision and land development process is given very little coverage, referring primarily to *Liveable Neighbourhoods*, which is still in trial and relates mainly to residential and town centre subdivision but not, to any degree, industrial or rural subdivision. The State Government's role as the only approval authority for subdivision in the State, via the Western Australian Planning Commission, is not referred to at all in the document.
- There is little reference to the *State Planning Strategy* even though its objectives are similar to the Sustainability Strategy and is structured on the key principles and outcomes of social, environmental and economic sustainability.

- Further work is needed on revitalising rural settlements, country towns and regional centres. Many of these areas are faced with considerable sustainability challenges including economic, environmental and social equity issues, many of which are complex and problematic and require commitment from all levels of government. A specific section devoted to this issue is warranted in the document, at least to the extent attributed to "Revitalising the Suburbs."
- Although the document is strategic rather than statutory in content an examination of the legislative context and opportunities for reform should form part of the proposed actions. This is necessary if the Strategy is to be successfully implemented and is particularly relevant to the proposed use of statutory planning mechanisms, such as Statements of Planning Policy.
- ***Include the following as distinct areas of examination in the document -***
 - ***Urban design, subdivision and land development process***
 - ***The role and relationship of the State Planning Strategy***
 - ***Revitalising rural settlements, country towns and regional centres, and***
 - ***Legislative context and reform.***

3.0 IMPLEMENTATION

This section of the document needs to be expanded considerably. The document states that a "detailed Implementation Program" will be developed following the finalisation of the Strategy and that finalisation of the Strategy will occur through a program of consultation and partnerships with key stakeholders, including:

- State Government agencies (Sustainability Code of Practice and Sustainability Procurement Policy),
- WA Collaboration (community organizations)
- WALGA (common sustainability framework)
- Regional agencies and communities (Regional Sustainability Strategies, Indigenous Regional Sustainability Strategies)
- TAFE, Universities, CSIRO, R&D groups (Global Centre for Sustainability)
- WA industry
- Key industry, academic & agency representatives (Sustainability Assessment Working Group)

Many of these actions will take several years to crystallise, therefore it is difficult to see how the Strategy (and importantly, implementation) will be finalised other than through the normal consultation and public comment process on the draft document.

It is not clear how the land development industry and planning professionals are included in the process other than the possibility of representation on the Sustainability Assessment Working Group. If it is intended that statutory planning processes be widely used for implementation of the Strategy then it is critically important that planning professionals and practitioners working in the private sector as well as those in Local and State Government agencies be acknowledged as key stakeholders and their contribution and participation in the process of implementing a wide range of proposed actions be sought.

Each of the key Actions need to be evaluated, prioritised, properly resourced and allocated to a specific agency or organization for implementation and be subject to on-going monitoring and review to ensure that the intended outcomes are achieved.

- ***Evaluate and prioritise all proposed action***
- ***Compile a realistic & effective implementation programme***
- ***Expand the range of implementation mechanisms***

4.0 PROPOSED ACTIONS

4.1 Sustainability Assessment

The Strategy proposes, as a transitional arrangement, the establishment of a Social Assessment Unit in the Department for Planning and Infrastructure and an Economic Assessment Unit in the Department of Treasury and Finance to complement the existing Environmental Assessment Unit in the Department of Environment, Water and Catchment Protection. These units are to be coordinated by the Sustainability Policy Unit in the assessment of State significant projects. Ultimately, sustainability assessment will apply to all projects and an Industry-Government Working Group on Sustainability Assessment is proposed to develop relevant processes and practices.

The statutory implications of this process are unclear in the document at this stage but are likely to require changes to existing planning and environmental legislation and administrative structures if the assessment procedures are to be truly integrated and directly accountable to the determining authority. It will be of particular concern if the establishment of the new assessment units results in duplication of resources, cumbersome procedures, propensity for appeals and additional timeframes for assessment and determination of proposals without beneficial outcomes.

Promotion of sustainability has, from time to time, alluded to the possibility of accelerating project approvals where compliance with sustainability checklists can be achieved. Industry experience in urban development suggests the reverse may be true in the planning and environmental approvals processes and will certainly be the case if sustainability assessment results in further duplication and layering of application assessment procedures.

- ***There is a need for simple assessment processes to avoid delays in application assessment and approval lead times***
- ***Integrate administrative structures & procedures rather than adding to them***

The Strategy vision on sustainability assessment is for it to "form the basis of all significant government decisions and is embodied into all levels of government activity". Although the processes and techniques are still to be developed, the Strategy suggests "checklists", multi-criteria analysis and quantifiable indicators for day-to-day projects. This is to ensure that projects have "a greater net benefit than alternatives when all relevant economic, social and environmental factors are taken into account." It is assumed that the Strategy intends this to also apply to private sector proposals.

This is not a new concept for planners - assessment of planning applications has long involved an assessment of the statutory, social, environmental, geographic, economic, cultural and historic impacts with a view to achieving an overall net benefit to the community and environment in which the proposal is located. This does, like sustainability assessment, involve some trade-offs to achieve maximum gain. Sustainability assessment is more likely to be expressed in quantifiable terms by the use of scored indicators rather than in qualitative terms. There is a need therefore to be clear about what indicators are being used and why, that they are relevant to a proposal's assessment and that they are measurable.

It is also essential that the sustainability "scorecard" indicators measure performance towards a clearly agreed outcome and do not cancel each other out. For example, the energy scorecard indicators proposed in the new Building Code of Australia work towards a net reduction of non-renewable energy consumption. Flexibility is allowed in the application of the criteria (for example, a building may orientate windows to the west instead of north but compensate by upgrading insulation), yet the clear objective of a statistical reduction of energy demand is achieved. There is concern that the Sustainability Strategy's scorecard assessment may measure performance against criteria that have the potential to contradict each other and fail to result in a net benefit.

- ***Ensure that sustainability assessment results in a change of emphasis, not a new industry***
- ***Ensure that sustainability assessment indicators have the capacity to achieve net sustainability gains.***
- ***Include AAPC representation on the Industry-Government Working Group on Sustainability Assessment***

4.2 Partnerships for Action / Planning for Sustainability

The Strategy proposes the establishment of a State-Local Government Roundtable to work through many of the proposed actions and to develop a common sustainability framework. This proposal is supported, however it should also include representatives from the development industry and professional associations, such as the AAPC, on specific issues such as Sustainability Assessment, Statements of Planning Policy, the proposed Planning, Building and Construction Guide.

Western Australia has a showcase of exemplary work undertaken by professional planners and urban designers in the private sector that have achieved national and international award winning status. Built examples include Ellenbrook, East Perth and Marlston Hill, examples yet to be completed include the Oxford Centre and Stirling Regional Centre.

It is clear that planning processes will be a central and crucial instrument in implementing sustainability measures. The involvement and contribution of planners in developing the Strategy is fundamental to its successful implementation.

There is also a need to acknowledge the role of urban design in achieving sustainability outcomes. Urban design is a major determinant of urban form in the land development process and has a major influence on the capacity to achieve sustainable outcomes in new and redeveloped urban areas. Urban design, as distinct from housing and lot layout design, should therefore be included as a discrete element in the proposed Planning, Building and Construction Guide.

- ***Include planning professionals and land development practitioners in the process***
- ***Include Urban Design as a distinct and featured element of the proposed Planning, Building and Construction Guide***

The Strategy proposes the use of Statements of Planning Policy and Regional Strategies for implementing many of the sustainability proposals in the document. Each of these will require extensive resources for Local Government and relevant State Government agencies. Planning resources throughout the State are currently under extreme pressure and in many areas have been for several years. These need to be carefully evaluated according to need and effectiveness in achieving the desired outcomes, prioritised and appropriately resourced. In particular, financial assistance and professional expertise will need to be made available to regional areas. A guideline for the preparation of Regional Strategies will need to be prepared and made available to Local Governments.

The scope, statutory limitations and implications of Statements of Planning Policy also need to be evaluated and should involve extensive consultation with industry practitioners, local governments and the community. Of particular concern will be their relationship to existing instruments such as the State Planning Strategy, Region Schemes, Local Planning Strategies and Local Government Town Planning Schemes so as to avoid duplication and inconsistencies.

The means of applying Statements of Planning Policy automatically and concurrently to all Local Government schemes and State Government agencies is not yet available in legislation but will be required if the stated intentions of the Strategy are to be achieved.

- ***Allocate sufficient and appropriate resources for effective implementation of the Strategy***

4.3 Managing Urban and Regional Growth

The State Planning Strategy should be a key feature of this part of the document, acknowledging and reiterating its purpose, objectives and content. The status of the two Strategies and their inter-relation will need to be clearly defined particularly in view of the strong reliance on statutory planning mechanisms and Regional Strategies for implementation of the Sustainability Strategy.

As referred to earlier, there is a need to undertake a critical examination of the issues related to the sustainability of country towns and regional centres, in particular the provision of services, employment, health and education.

- ***Acknowledge the State Planning Strategy as a key implementation mechanism for the Strategy***
- ***Place greater emphasis on sustainability measures for country towns and regional centres***

4.4 Housing and Sustainability

Housing needs to be considered in terms of choice, affordability, flexibility, tenure, and social mix with product opportunities arising from mixed use, land recycling and building conversion. These factors need to be reflected in housing policy and strategies at both Local and State Government level. Opportunities for additional housing in accessible locations that are well serviced with existing facilities and infrastructure should be investigated for all government redevelopment sites within the metropolitan and regional areas.

- ***Examine opportunities for housing on all government redevelopment sites within the metropolitan regional areas.***

4.5 Community Awareness for Sustainability

Community involvement in formulating sustainable strategies can help to promote ownership and responsibility in implementing sustainability measures. However, the precise role of community in pursuing sustainability in the planning application assessment process requires rigorous consideration.

There is a need to arrive at community consensus as to what constitutes sustainable development, in particular as it relates to urban form. In the absence of an agreed public perception of what characteristics constitute sustainable settlement forms or practices, both the industry and community will have little or no common vision and purpose and uncertainty and conflict is inevitable.

- ***Develop agreed principles on what constitutes sustainable development in relation to urban form.***