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Enquiries: Richard Hindley

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Sustainability Policy Unit
Department of Premier and Cabinet
197 St Georges Tce
PERTH WA 6000

Dear Sir or Madam

COMMENTS ON THE DRAFT STATE SUSTAINABILITY STRATEGY

The Consultation Draft of the State Sustainability Strategy (the Strategy) provides a range of tools to reach sustainable ends, however there are a number of gaps and areas that require greater emphasis prior to the Strategy being finalised.

Application Across the State

The broad focus of the Strategy enables wide application but there needs to be the ability to cater for local conditions. It needs to be recognised that solutions that work within the Metropolitan area may not work in smaller settlements or rural areas. Disparities will occur between regions (and different local authorities within a region) on many issues and this needs to be recognised in the Strategy. The Strategy's success will be measured in part by its robustness, that is its application in the Metropolitan region and a small rural settlement needs to be equally successful.

Flexibility of Approaches

Local government can have an impact on all aspects of sustainability and whilst it is recognised that many Councils are committed to sustainability through Local Agenda 21 it needs to be recognised that many other local governments are developing their own approaches to sustainability. The development of a common sustainability framework, as is proposed, should not be to the detriment of existing approaches; rather it should provide a series of tools that can be used to achieve sustainable outcomes.

Sustainability Assessment Capability

The Strategy recognises that a key component in making sustainability work is the formulation of a suitable assessment process. The Strategy outlines that the Environmental Protection Authority Services Unit will be responsible for environmental assessments, the Department for Planning and Infrastructure will be responsible for social assessments and the Department of the Treasury and Finance will be responsible for economic assessments. The assessment process appears to be very centralised as a result of a State focussed assessment process for projects, plans policies and programmes.

Due to the volume of projects, plans, policies and programmes that are created both by State and local government it is not considered practical to base an assessment process in three centralised agencies. In the case of local government there needs to be provision to make this assessment 'in house', utilising existing expertise to ensure that the local context is given due consideration. The development of local assessment processes is of particular importance as local governments are positioned to have the greatest immediate impact on sustainability due to their close relationship with the community.

Impact on Land Use Planning & Development Control

The Strategy identifies that the planning system has potential to have a major impact on sustainability. Western Australia has an established planning system, which is administered by agencies with considerable experience in dealing with a range of development issues (in addition to the public). The inclusion of sustainable principles in the planning system will provide a significant opportunity through both statutory and strategic processes to influence the type and direction of development. The Strategy should acknowledge this potential and should focus on modifying current controls in a manner that assists in reaching sustainable outcomes.

The Strategy outlines that Statements of Planning Policy and other strategic documents have a strong role to play in ensuring that issues relating to sustainability are considered in planning processes. It is suggested that modifying the Model Scheme Text to contain a range of sustainable provisions may create further gains. As new schemes are created they will be required to take into account standard sustainability provisions which will then be applied on a local level.

When developing sustainability criteria, and associated performance indicators, for the assessment of development it is important to ensure that the criteria enable the assessment of development from a balanced perspective. This is particularly important considering the focus of the existing system is on environmental protection and economic gain with little consideration being given to social implications.

There is an identifiable push to more sustainable outcomes as is illustrated in the new energy efficient controls that are to be adopted for the Building Codes on the 1st July 2003 and the new Residential Design Codes (which place increased emphasis on sustainability through incorporating provisions that influence built form and the way that buildings and hence people relate to each other). The Strategy should build upon the foundation that has been created by these documents.

Access to Training

The criteria used as part of a sustainable assessment process will need to be utilised by a wide range of officers. There is some concern that the officers asked to perform these assessments may not be adequately trained in the assessment criteria thus impacting on the overall potential benefit gained by such an assessment process. The criteria need to be developed so that they have wide application (by being easily understood) or that accredited training is provided to ensure that there is an adequate knowledge base on which to give the criteria effect consideration.

There is a need to encourage training bodies such as the Western Australian Local Government Association and tertiary institutions to develop quality sustainability training programs.

Focussing on sustainability in postgraduate management development courses will raise the awareness of the managers of today and the leaders of tomorrow. The end result is to ensure that local and state government have access to managers and staff who can achieve a best practice approach to sustainability.

Need for a National Framework

The Strategy does not include a section on relationships with the Federal Government. There is a need to include an action for the West Australian State Government to lobby the Federal Government to sign the Kyoto Protocol and to develop a national framework (including national indicators) for sustainability.

Lack of Genuine Balance in the Strategy

Also of concern is the Strategy's biased focus when it comes to the three areas of sustainability. The State has a great deal of experience when it comes to environmental assessment and the Strategy understandably builds on this strength however care needs to be given to ensure this is not to the detriment of social and economic considerations. A biased approach to sustainability may actually result in a model not being sustainable at all.

Modifying the measures of economic growth is not sufficient to modify current mainstream philosophies and practices. There is a need for mechanisms/initiatives to be developed to ensure that economic benefits flow on to a number of marginalised groups in the community such as the long term and youth unemployed. The Strategy needs to focus on the management of economic growth and community development to ensure they reach sustainable and equitable outcomes.

State & Local Partnership

The formulation of a partnership arrangement between State and Local Government has the potential to provide for a coordinated approach to sustainability across the State. Whilst a common set of aims and controls will be developed specific reference still needs to be made to the initiatives that have already been undertaken by local Government through Local Agenda 21 and other programs.

Resourcing the Implementation of the Strategy

One of the major weaknesses of the Strategy is the apparent lack of reference to resourcing (both of local and state government) to deal with the implementation of sustainability at a local level. The requirements of sustainability assessment along with changing practices and increased training needs will be a significant cost that may not be easily borne by many local authorities.

Whilst in the long term an approach may be considered sustainable there still needs to be some recognition of the 'initial start up costs' that will be incurred.

Should you wish to clarify any matters raised in this submission please do not hesitate to contact myself on direct telephone 9841 9385 or via email richarhi@albany.wa.gov.au.

Yours sincerely

Richard Hindley
Planning Officer - Policy

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