

Our Ref: PSC/33

18 December 2002

Professor Peter Newman,  
Director,  
Sustainability Policy Unit,  
Department of the Premier and Cabinet  
15th Floor Governor Stirling Tower  
197 St Georges Terrace  
Perth Western Australia 6000

Dear Professor Newman

***THE WESTERN AUSTRALIAN STATE SUSTAINABILITY STRATEGY***

The Council of the City of Armadale at its meeting on 16 December 2002 considered the WA State Sustainability Strategy and resolved to make a submission on the Draft State Sustainability Strategy:

1. commending the State Government for preparing the draft Strategy;
2. requesting a review of the definition of sustainable development to reflect the acceptability of trade-offs provided any development has a greater net benefit than alternatives when all relevant economic, social and environmental factors are taken into account;
3. expressing concern that sustainability assessment should not result in an additional administrative layer on the existing planning approval process;
4. expressing some caution at the use of Statements of Planning Policy for the achievement of land management objectives; and
5. not providing a general endorsement to the detailed individual Proposed Actions at this stage subject to providing additional officer comment relating to local government.

Additional specific comments on State Sustainability Actions of relevance to the City of Armadale have been included in the Appendix attached to this letter.

Thank you for the opportunity to comment.

Yours sincerely

IAN MACRAE  
EXECUTIVE DIRECTOR  
DEVELOPMENT SERVICES

## APPENDIX

### Specific comments on State Sustainability Actions of relevance to the City of Armadale

#### **Partnerships for Action**

*1.8 Establish a partnership with local government (represented by WALGA) to create a State-Local Government Common Sustainability Framework consisting of common principles, goals, approaches, and programs. It will build on the sustainability framework outlined in this strategy. This framework will be formally set out in a partnership agreement.*

Comment:

This proposed action is supported.

*1.9 Support a State-Local Government Sustainability Roundtable to create the partnership agreement and its implications for local government sustainability. The Roundtable will explore the role of regional councils (groups of local government) in supporting sustainability, the implementation by individual local government and the role of state government in enabling local governments to fulfill these roles. Involve the WA Collaboration in the roundtable as well as industry and research interests.*

Comment:

This proposed action is supported subject to true consultation on regionalisation.

#### **Planning for Sustainability**

*1.11 As part of the State-Local Government Roundtable examine the issue of how assessment can create a better process for involving local government in large development projects.*

Comment:

This proposed action is supported.

*1.12 Work with local government, industry and community through the State-Local Government Roundtable to investigate the application of statutory planning and other processes in support of sustainability outcomes. Statements of Planning Policy can be developed and then be given legal effect through adoption by the Western Australian Planning Commission and state government. Once adopted, Statements of Planning Policy will guide the actions of Local Government and State Government agencies.*

Comment:

Note concern that Statements of Planning Policy need to be carefully drafted and not generally used to implement land management objectives.

*1.13 Support the increased involvement of local government in planning for natural resource management generally, including issues of agricultural sustainability,*

*particularly regional drainage, biodiversity conservation, regional revegetation programs and water quality. As part of the State-Local Government Partnership Agreement explore opportunities for regional councils and local councils and statutory planning processes (such as Statements of Planning Policy and Environmental Protection Policies) to support natural resource management outcomes, including the possibility of adopting regional natural resource management strategies through Statements of Planning Policy.*

Comment:

Strategic planning for natural resource management should remain with the State government.

Natural resource management planning uses different boundaries for different aspects of natural resource management, and strategic planning often needs to rely on specialised expertise not held by local government administrations. For example, biodiversity conservation through retention of remnant vegetation (i.e. bushland) uses the Interim Biogeographic Regionalisation for Australia (IBRA) framework along with assessment of the bushland by a botanist to determine conservation significance of remnant vegetation. In contrast, regional drainage assessments should be based on catchment boundaries. It is unlikely that IBRA and catchment boundaries match. Furthermore, it is even less likely that local government administrative boundaries and the different natural resource management boundaries match. Creating regional councils for each issue is not considered realistic or appropriate.

Whilst statutory planning processes could be improved to explicitly identify areas that have conservation value rather than identifying them just as Parks and Recreation reservations, there is little more that statutory planning processes and EPP's can do to protect remnant vegetation. Clearing is proposed to be controlled through amendments to the Environmental Protection Act, and once this is in place the major threats to biodiversity will be issues that are probably not within the ambit of statutory planning. For example weeds and dieback are a major threats, but it is questionable whether planning controls are an appropriate way to prevent people planting living next to conservation areas from planting plants that will become weeds or that may carry dieback in the soil.

Recommendation 1.13 is not supported.

### ***Sustainability in the Regions***

*1.16 Develop Regional Sustainability Strategies. These strategies will provide an opportunity to apply the broad framework of the State Sustainability Strategy with Regional Councils and local government through Statements of Planning Policy and other statutory and non-statutory instruments, as described throughout the Strategy. These strategies will build on regional natural resource plans, regional*

Comment:

The same comment as for 1.12 above.

*3.3 As part of the State-Local Government Partnership Agreement, establish Regional Councils and other processes that can meaningfully involve local government in issues of agricultural sustainability, particularly regional drainage, biodiversity conservation, regional revegetation programs, water quality and soil acidity. Local governments could then incorporate regional sustainability priorities into their local town planning schemes.*

Comment:

Similarly to 1.13 this proposed action is not supported as Strategic planning for natural resource management should remain with the State government.

*3.6 Improve the coordination of fox and feral animal control programs in regions to focus on core areas of regeneration and conservation where at-risk wildlife can be protected. The involvement of local government and farmers can be coordinated through the State-Local Government Partnership Agreement.*

Comment:

Supported. It should be noted that the City is about to do research on cats.

### **Protection Aquatic Systems**

*3.40 Ensure that activities in catchments are actively managed to ensure that environmental values of downstream environments are not compromised degraded or destroyed through management, community partnerships and legislation.*

Comment:

The City strongly supports the Armadale Gosnells Landcare Group with is undertaking catchment management.

### **Revitalising Declining Centres and Suburbs**

*4.7 Develop a 'Reviving the Suburbs' initiative to revitalise declining suburbs based on community processes, innovative urban design, public-private housing ventures, co-location of services, improved infrastructure and community arts projects.*

Comment (also applies to 4.8 – 4.11):

The City of Armadale has initiated the Neighbourhood Improvement Project (NIP) aimed at revitalising suburbs.

*4.8 Trial 'Reviving the Suburbs' in partnership with a local government.*

*4.9 On the basis of this trial create an urban design Community Code for Revitalisation.*

*4.10 Enable more targeted government intervention and investment into local government areas of decline and opportunity through ongoing revitalisation programs.*

*4.11 In consultation with local government, progress higher density residential development by linking the provision of government infrastructure (infill sewerage program and underground power) and services (expansion of public transport) with commitments to local urban consolidation.*

***Integrating Land Use and Balanced Transport***

*4.13 Move towards requiring all government and significant residential development projects to adopt the framework which has been used in the Liveable Neighbourhoods.*

Comment:

It should be noted that Liveable Neighbourhoods has been adopted in principal in the City's Local Planning Strategy.

*4.15 Update the Perth Bicycle Plan and work closely with local Bicycle User Groups to better resolve local and regional bicycling issues and assist with the provision of safe local bicycle routes, shared paths and end of trip facilities to encourage children to cycle and walk to school.*

Comment:

It should be noted that the City has a bike plan.

*4.20 Encourage local government to provide for flexibility in residential zoning, which allows small businesses and 'corner shop' retail facilities to locate in existing suburban communities.*

Comment:

Proposed TPS No 4 indicates that Home Business is a discretionary use (subject to advertising) in Residential Zones.

*4.21 Encourage flexibility in local government parking policy in areas where there is good public transport.*

Comment:

It is likely that the Armadale City Concept Plan will allow for such flexibility. In addition generally flexibility regarding parking is provided through the R-Codes, although Council would need to be cautious in approving development without standard parking provision.

***Managing Freight and Regional Transport***

*4.28 Extend the Freight Network Review principles and concepts to the whole state.*

Comment:

While the general issue of shifting freight to rail could be supported this matter warrants discussion as the focus to date has been in and around Fremantle. The implications to the City of Armadale could be significant.

### ***Our Water Future***

*4.55 Develop partnerships with local government to ensure water sensitive urban design is built into all urban development.*

Comment:

Council has a history of pioneering in this area of water sensitive design.

*4.56 Ensure Regional Councils, co-ordinated by the Department of Environment Water and Catchment Protection, take more responsibility for managing groundwater, including bores, through the development of Regional Groundwater Management Plans.*

Comment:

Groundwater boundaries have no relationship to Council (and hence Regional Council) boundaries. The current system establishing separate Groundwater Committees works and should remain.

This Proposed Action is not supported and should be deleted.

### ***D6/00 Sustainable Energy***

*4.59 Develop further voluntary schemes with the housing industry to demonstrate at least 4 star energy rating on all new homes and move to a more mandatory scheme through a Guide to Sustainable, Planning, Building and Construction developed with local government and industry.*

Comment:

Voluntary schemes can be supported. Mandatory schemes for energy rating should be thoroughly tested to ensure that the impact on housing costs, and particularly the first time home buyer, are not excessive.

*4.60 Develop a rating scheme for all home renovations that provides incentives for renovators who adopt certified energy efficient renovations.*

Comment:

It is unclear what type of incentives would be offered, however such an approach could be supported provided any penalty on non-complying renovations were thoroughly tested.

*4.61 Ensure Town Planning Schemes require solar orientation of new developments to achieve 80% oriented houses, and provides guidance on the re-orientation principles as part of all renovation approvals.*

Comment:

Town planning schemes are not the appropriate mechanism for securing solar orientation for most housing situations. Most houses are built on pre-existing lots created by the WAPC under its policies rather than those under a TPS. Policies could provide some guidance to encourage solar orientation by guiding council in the exercise of its discretion where solar access criteria are met.

### ***Preserving Cultural Heritage, Landscapes and Creating ‘Sense of Place’***

*4.71 Seek to minimise energy use by:*

- *Household energy conservation information programs*
- *School curricula and management to demonstrate energy efficiency*
- *Supporting mandatory national standards for energy efficiency in appliances and vehicles*
- *Ensuring government procurement is based on life-cycle costing to properly account for the cost of energy*
- *Using sustainability assessment to include life-cycle analysis on all such decisions.*

Comment:

These actions would help the City meet its goals for greenhouse gas emissions as adopted under the Cities for Climate Protection Program.

*4.73 Encourage local government’s implementation of heritage to be consistent, transparent and builds on precinct plans that establish guidelines for how to protect and enhance the essential character of their area whilst allowing for sympathetic infill and redevelopment.*

Comment:

Noted and supported.

### ***Building Sustainably***

*4.78 Promote a voluntary 4 star energy rating on all new homes.*

Comment:

Noted and supported – voluntary schemes should be supported.

*4.79 Produce a Sustainable Planning, Building and Construction Guide through the State-Local Government Sustainability Roundtable and in close consultation with industry stakeholders.*

Comment:

Noted.

*4.80 Progressively incorporate the principles of the Sustainable Planning, Building and Construction Guide into relevant state government documents such as a Statement of*



*Planning Policy, the Building Codes, the Design Codes, R-codes and local town planning schemes.*

Comment:

As with comment on 4.59, the incorporation of additional standards needs to be undertaken with care to avoid excessive impacts on housing affordability.

### **Community Services and Development**

*5.4 Review crime prevention programs to ensure links between community development initiatives and sustainability as a way of focussing partnerships in areas of multiple social disadvantage, especially using 'sense of place' projects.*

Comment:

Noted.

### **Education and Community Awareness for Sustainability**

*5.27 Develop and support partnerships on sustainability education with other sectors (such as local government and the WA Collaboration) to maximise the delivery of sustainability education.*

Comment:

Noted and supported.

***In addition it is recommended that the following matters be included in the State Sustainability Strategy:***

### **Responding to Greenhouse and Climate Change**

The 3c/Kw premium on renewable energy currently charged by Western Power should be removed or reduced and the cost of brown electricity should be increased to fund renewables.

The City of Armadale has written to the Minister for Energy stating that the high cost of renewable energy is significantly inhibiting the City's progress in achieving its desired greenhouse gas emission reduction targets.

### **Sustainable forestry and plantations**

Recommendation 3.23 concerning dieback should also include development of an accreditation process so that dieback-free materials can be reliably sourced for road construction and other activities that require the importation of materials (e.g. for building pads).