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9 January 2003

Sustainability Policy Unit  
Department of the Premier and Cabinet  
197 St George's Terrace  
PERTH WA 6000

**Attn: Dr Ross Field**

Dear Dr Field

**RE: SUBMISSION ON "FOCUS ON THE FUTURE: THE WESTERN  
AUSTRALIAN STATE SUSTAINABILITY STRATEGY:  
CONSULTATION DRAFT"**

Thank you for referring the above Consultation Draft to the City for comment. The document has been reviewed and the comments as listed in the attachment have been provided for your consideration.

If you require any further clarification regarding any of the points raised please do not hesitate to contact Jason Foster, Environmental Planner on 9780 8282.

Yours faithfully

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Ken Weary  
**A/CHIEF EXECUTIVE OFFICER**

Enc: City of Bunbury Submission

## Overview of Selected Strategic Actions

The document has been reviewed and the City wishes to express its in principle support for the initiative taken by the State Government in developing this Strategy and is in general agreement with the intention of the recommendations made. The Strategy is comprehensive, however the essence of achieving sustainability through specific actions tends to get lost throughout the document. The Strategy places a clear emphasis on the Perth metropolitan area in regards to many of the proposed actions. There needs to be a stronger emphasis placed on the importance that regional Western Australia has in regards to achieving sustainability principles.

Whilst it is acknowledged that an action plan and partnership agreements are to be progressed and finalised within the next 12 months for this strategy it is assumed that agency responsibilities and expected time frames for achieving specific actions will be included in this action plan. There are a significant number of actions to be implemented over a range of areas and without a designated framework for implementation there is the risk that the Strategy will not be appropriately utilised.

The term “ best practice” is referred to in the Strategy recommendations. The term “ best practice” needs to be clearly defined to provide a clear benchmark for user groups to works towards. Best practice is a cliché that is not universally understood to include cost as well as social and environmental values and as such may not be the most appropriate standard for every situation.

## Regional Development and Growth

The promotion of regional development and growth should be seen as an important key to government in achieving sustainability. Appropriate land use planning, policies and legislation can lead to the establishment of sustainable developments that are self reliant on local resources from which they are based. One example of this is the requirement for the establishment of settlements where there is an available water source. It is unsustainable for regional catchments to be depleting local resources to sustain and maintain inappropriate metropolitan planning, development and lifestyle. In the current state of affairs, regional natural resources continue to be depleted, with significant long-term environmental damage. Future urban developments should be based on available sustainable resources within the immediate region.

Decentralisation to regional areas and fragmentation of large urban sprawl should be recognised as another important issue that deserves further discussion within the Strategy. Decentralisation to regional areas will assist in ensuring that natural carrying capacities are not exceeded. Current mentalities and themes across various levels of government acknowledge the metropolitan areas strong links to regional growth and development. At present most State Government agencies, whether it be planning agencies or government utility service providers, primary focus has been the establishment and build up of the Perth Metropolitan area. This current 'across the board' framework of thinking is not reflective of the State Government's election commitment to achieving a more sustainable Western Australia. Current state planning and regulatory bodies is a central system whereby resources absorbed by the state are put back into Perth.

## **Sustainability and Settlements**

The City is in agreement that integrated resource planning is vital in progressing sustainability.

State land use planning legislation should be viewed as the key to controlling and appropriately planning urbanisation. Current State planning legislation does not encourage conservation or sustainability principles, current R code zonings, block sizes, subdivision designs, continual push for urban sprawl and the current State Government planning strategies do not set an appropriate standard for business, industry and the general community to follow.

State Government subsidisation of urban sprawl must also be turned around to create a system where developers pay for the true cost of development. An example is the proliferation of low density subdivisions occurring along the southern freeway extension. These low density residential subdivisions that are up to 70 km from the Perth CBD have only been made saleable by the extension of the freeway. They result in considerable burden on transport infrastructure and they demonstrate some of the most unsustainable practices in terms of water use and vehicle dependency, yet as they have not had to contribute to the major transport infrastructure that has made them feasible, they are more economically attractive to developers and residents than more sustainable land development.

State Governments including Queensland and New South Wales have a legislative framework for developer contributions to infrastructure. An action for this strategy needs to be the development and introduction of developer contribution legislation in Western Australia.

Population issues and the rapid unsustainable expansion of low-density residential areas in the metropolitan area are not adequately addressed yet should be an issue that requires further mention in the Strategy. There is discussion on global population but nothing on local/state population. Neither does the strategy consider what is the most sustainable urban form. Population underpins most issues surrounding the concept of why we need sustainability. This is a significant issue and deserves further attention and subsequent action.

Growth affects all sustainability principles and if growth management is not implemented effectively sustainability principles will continue to be lost. Again many of the strategies and actions are aimed at the metropolitan area. What about regional development plans and promotion from the state level regarding regional development? An extensive commitment to regional development by the State Government across all services and policies is required to promote regional development as a means of managing unsustainable growth in the Perth metropolitan area.

The urban sprawl of Perth is the major issue affecting the sustainability of urban development in Western Australia. Perth is larger in area than European cities of up to 20 times its population. This is made worse by Perth being developed linearly along the coastal plain, a form that puts greater demands on transport and service infrastructure. Recommendations to reduce excessive sprawl and reverse State Government subsidisation of sprawl are needed in the strategy. Recommendations could include amending planning policies and performance criteria to ensure a high level of infill or consolidation of development occurs before further extension of the Perth metropolitan footprint.

## **Options for Structural Change**

The current system provides far too much emphasis to the centralisation of management. This approach directs the consumption of regional resources and finances to sustain a single major city. An alternate option is the divestment of resources into regional areas to promote sustainable regional growth. At present the centralised approach leads to significant funds, being funneled back to metropolitan Perth.

The current State monopoly of the water industry restricts innovation in the use of our water resources. The Water Corporation is less flexible and adaptable to local and regional situation, creates barriers to reuse projects, their incentive for whole of catchment management are limited to those catchments that they have dammed and their environmental targets are imposed, rather than as a direct response to the community.

They spend vast sums on centralising water and waste water systems which greatly discourages wastewater reuse.

The Federal Senate Inquiry into Urban Water identified solutions including demand management, reuse and recycling, new generation small scale wastewater treatment plants (better for reuse) and water sensitive urban design as being required to address Australia's unsustainable urban use of water resources. These solutions will not be implemented quickly and effectively if it is left to an organisation who has a monopoly on the sale of water, thus we feel it is important to address structural change in the water industry as part of the State Sustainability Strategy.

The State Government's Water Conservation Strategy identifies that Western Australia's wastewater reuse of 7% is below the national average of 11%. The State Water Symposium went further and identified that only 3% of Perth's treated wastewater is reused compared to about 30% for country towns.

Permitting Local Governments to offer water and wastewater services will increase whole of catchment management, community ownership and resource management. It will make it easier to implement wastewater reuse projects on a local and regional level. It would result in greater application of water sensitive urban design principles. With Local Government responsibility for stormwater, wastewater water supply and receiving water quality, it would make water conservation programs more effectively implemented.

The current State structure for planning decisions must also be reviewed to provide for more transparent and accountable local planning decisions. Recent decisions of the South West Region Planning Committee of the Western Australian Planning Commission have had no regard to the decisions of Local Government – which have been based on public advertising, public debate and are made in an open public forum by publicly elected representatives. The committee of limited representation frequently over turns Council decisions in closed forums without public scrutiny - often with inconsistencies between advice provided by other state planning authorities such as the Department of Planning and Infrastructure (Transport Division). There needs to be changes to the WAPC decision-making process to ensure the accountability and transparency of decisions, with the most effective way being for the devolution of planning services back to local government - particularly if the amalgamation of smaller regional local government authorities to form larger regional councils is pursued (this is discussed further in the 'Regional Sustainability Strategies' section).

## Regional Sustainability Strategies

The draft strategy places a strong focus on the development of regional sustainability strategies. In principle, this strong focus is supported, however the development of such strategies cannot be adequately addressed when the document has a clear focus on the transfer of regional resources to continue to 'prop up' the Perth metropolitan area. Current unsustainable land use planning decisions and practices across the state need to be addressed prior to resources being extracted from the regions. In many cases local communities do not have adequate input into regional projects that have significant social, economic and environmental impacts. Regional Western Australia provides significant resources for the State and at present there is very little put back into regional development and promotion of decentralisation. Regional sustainability strategies should be a high priority for government to enact and assist with facilitation in order to illustrate its commitment to such sustainability principles.

It is recommended that further emphasis be placed on the investigation and progression by the State, in partnership with local governments, regarding the amalgamation of smaller regional local government authorities to form larger regional councils that could manage and operate on a catchment scale - as is the case with many local authorities on the east coast.

Such amalgamations, which would be in line with the machinery of government initiative enacted by the current government, would eliminate the current overlap in resources and provide for a better coordinated approach to bioregional planning and catchment management. In fact the creation of larger regional council bodies would also provide for better co-ordinated delivery of services (ie. water, sewerage and land use-planning) to the community.

For example, within the Leschenault catchment area, there are a number of small local government authorities within a close proximity that all face the same economic, social and environmental issues, however with current governance arrangements planning is not coordinated and as a result there are significant detrimental effects on the natural environment. Amalgamation is seen as an efficient way of pooling resources and strengthening catchment based bioregional planning, it would allow for greater capacity to deal with many of the issues outlined in the strategy including natural resource management, settlement issues, growth, air quality issues and integrated transport planning. It is recommended that this be included as an action for the state to progress in achieving sustainability in partnership with local authorities.

An alternate option could be the divestment of management and control of urban water and sewerage schemes through to local governments. The local government would operate the system and collect the funding directly through its existing rating system, which matches the current local government rating system. Where a local government does not have access to locally available water supplies, the state government would be responsible for the provision of the water resource through a specific authority, which would be responsible for the provision of significant bore-fields, dams and regional pipelines. This new authority would have a similar role to that envisaged with the break-up of Western Power in relation to the transmission component. The local government would pay the appropriate commercial rate, incorporating the resource royalty, storage and transportation costs for the water commodity purchased in bulk.

A clear advantage of this alternate system is that it places the control of this vital infrastructure back in the hands of the local and regional communities. At present the centralised approach leads to significant funds, collected on the basis of water and sewerage service provision charges, being funneled back to the state government consolidated revenue accounts through the Water Corporation's dividend payments.

### Triple Bottom Line

It has been suggested that social and economic advisory bodies be created in much the same way as the way EPA address proposals. Integration of sustainable outcomes is much welcomed, however the practicalities associated with the establishment, through the allocation of resources and funding of such arrangements it seems has not been given adequate consideration. This is reflective of many of the proposed objectives of this strategy. There needs to be appropriate allocation of resourcing by the State to allow for the success and progression of this strategy.

It would be more appropriate to amend existing process and legislation to include social and economic considerations rather than introduce more bureaucracy and red tape. As an example EPA already deal with social issues such as Aboriginal heritage within their current processes. This could be expanded to consider other social and economic factors. Similarly state planning policies could be amended or introduced to consider additional social and economic factors as part of the development process.



We welcome triple bottom line assessments of planning and projects at all levels. We believe that this will also be a step toward addressing our earlier concerns that urban sprawl in Perth is being subsidised by the State Government as developments on the fringes of Perth are not paying the true cost of infrastructure.

## **Sustainability Assessment**

The document makes mention that to ensure that government achieve overarching sustainability that the government will carry out sustainability assessment on significant projects. It is suggested that local government should be involved as a key stakeholder in the development of a sustainability assessment criteria. It is also recommended that local government should have a role to play in the assessment process, as it is the closest sphere of government to the community, being best able to table views of the community.

The Strategy makes mention of the state- local government roundtable which would be developed to investigate the potential of statutory planning systems and regional councils. It is of the understanding that the Western Australian Local Government Association has been involved in discussions regarding such issues. The City has not been informed of any such involvement and would appreciate direct contact regarding the progression of such issues. ??

## **Sustainability and Governance**

The Strategy states that the Western Australia system of governance is world famous for being responsive to sustainability issues. Although the strategy is an important first step towards a sustainable future there is no clear long-term commitment to ensure that such sustainability principles will be adopted across various levels of governments and private enterprise. Government needs to clearly show long-term commitment and leadership on sustainability. At present commitment through the newly established sustainability policy unit that is staffed by 1 to 2 contract personnel due to end of the finalisation of the strategy is not reflective of a clear commitment to this initiative.

The Strategy makes mention of future roles for regional development commissions, there seems no real need for such commissions to exist, they are just another level of bureaucracy. At present the Commission's role is to facilitate between the state and local level. It is of the experience that liaison usually occurs direct with the state that is seen as achieving better outcomes.

Any expansion in the role of development commissions would be seen as resource consuming and unnecessary. There is need for a long-term commitment to sustainability across state government agencies, for it to filter through to the local level that is regulated by the state agencies.

## **Sustainable Use of Natural Resources**

Local governments need to be better involved in the development of regional natural resource management plans to ensure adequate consideration of the social, environmental and economic implications surrounding the harvest of such resources. Statutory mechanisms to support the sustainable use of natural resources will only be effective if brought in across the board and regulated at the state level. At present many smaller local governments do not have the resources or technical expertise available to be involved in natural resource management. As previously indicated small municipal boundaries create problems with management, in particular politics at the local level have a significant impact on natural resource management. As smaller authorities strive to achieve a higher rate base, to compete with adjoining authorities to provide upgraded community services and infrastructure, environmental and social concerns are more than often comprised. There is a strong need to have direct involvement from the state on this issue if the government are serious about achieving sustainability and conservation principles across the state.

We also take this opportunity to highlight an example of the need for natural resource planning on a regional level that is affecting the ability of small local communities to manage community infrastructure. Several towns in the South West have found that the practice of extraction of gravels for road building and maintenance from state forest areas has been stopped. Gravel supply while plentiful in the region is locked up in State forests and private land and Councils are being denied access. There was an assumption that past practices of extraction from state forest would continue however new policies are having a significant impact on communities while new sources are still trying to be identified and secured.

## **Sustainable Coasts and Marine Environments**

The development and formulation of a specific over arching Planning Act, which incorporates both strategic and statutory development planning as well as environmental and coastal issues for Western Australia is seen as imperative.

Such legislative amendments to develop such an Act would strengthen the planning responsibilities and powers of local government and State agencies in their decision making process in regards to local planning and coastal issues, which would still ultimately be governed by the State in accordance with national legislation. At present there is no clear framework or State based legislative approach to coastal management and planning issues.

At the present there are numerous policies and programs in place across various agencies governing coastal management issues. Such policies include Coastal Zone Management Policy, Draft State Coastal Planning Policy, Coastal Environmental Protection Policy and Coastal Planning Program. The number of policies in place and the various agencies involved in coastal planning issues clearly illustrates that the current system is already fragmented, and as such issues surrounding this area have been highlighted for investigation.

The establishment of a specific Planning Act which was not limited to, but incorporated both strategic, statutory, coastal and environmental issues would allow for clear and agreed objectives to be included in the guidance provided for the assessment of cumulative impacts. In a number of cases the current structural arrangements are not easily understood and the development of an over arching Act would in the long term minimise confusion over state, regional and local planning issues.

In the interests of a coordinated approach for appropriate environmental protection and sustainable development there is merit in developing a state based legislative approach that could be enforced by local government's through the Western Australian Planning Commission. The benefits in this would be that local governments are best suited to consult with the local community. An elected Council ultimately makes local planning decisions, as the local community representatives. The development of a combined formal legislation will bring coordination and integration amongst all the stakeholders, as well as involve the community at the local planning level regarding local issues. The development of an overarching framework would also allow for greater transparency. Such an Act would seek to combine existing legislations and policies to minimise any duplication within the current planning system.

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

We strongly commend the State Government and Department of Planning and Infrastructure in the development and introduction of the Liveable Neighbourhoods Code and support the broad adoption of Liveable Neighbourhoods in planning new and revitalising existing urban places. We support the objectives as stated, however believe that the actions will not achieve the objectives. As mentioned previously, urban sprawl is resulting in unsustainable development in Perth including transport systems. Land use planning controls and payment of the real infrastructure costs by developers is required to bring back into balance urban consolidation and redevelopment of inner suburbs compared to development of new outer metropolitan suburbs.

We note that the \$1.4 billion southern rail expansion is listed as an action underway that is achieving the above objectives. We question whether this has been assessed against the triple bottom line criteria given within this very State Sustainability Strategy. In particular we question whether the cost of the project and its impact on the entire states capital works programs can be justified by a comprehensive triple bottom line cost benefit analysis.

While the project may be warranted in the longer term, the current funding allocation and the extensive subsidisation from government that will be required for its operation is not warranted by the benefits in the short term.

## **Our Water Future**

A major shortcoming of the government response to water shortage is that it fails to recognise and address the environmental issues and associated effect that the diversion of water to the Perth metropolitan area, from regional catchments areas has. The true environmental, social and economic costs of diverting these waters has not adequately been addressed and it is not acceptable for water to continue being diverted into the metropolitan area to continue to support and “top up” a City which is clearly not operating sustainably in regards to its water use. Integrated resource planning is vital in identifying sustainable alternatives for water conservation initiatives. State land use planning legislation also has a significant role to play in minimizing urban water consumption. As previously indicated state planning legislation does not encourage water conservation principles.

The unsustainable practice of developing new water resources outside of the Perth metropolitan region that permits further expansion of low-density residential areas in Perth is strongly opposed. Current state planning and regulatory bodies is a central system whereby resources absorbed by the state are put back into Perth.

In the current state of affairs regional natural resources continue to be depleted, with significant long-term environmental damage. Future urban development should be based on sustainable water supplies within the immediate region.

There is a clear need to assign a true natural environmental cost to water as commodity and limited natural resource. It would be appropriate to apply a royalty charge for the base use of the water resource in a method similar to all other natural resources, which are mined. The royalty would provide a funding mechanism to ensure the ongoing management and protection of the water resource to ensure a sustainable environment today and for future generations.

At present the Western Australian water industry is characterised by one large utility that has direct involvement with the government who's primary focus is the establishment of new water sources to supply the Perth Metropolitan area The diversion of water from south of Harvey for the metropolitan area is not supported. In the current state of affairs regional natural resources continue to be depleted, with significant long-term environmental damage. Future urban developments should be based on sustainable water supplies within the immediate region.

Attached is a copy of the City's submission on the Draft Water Conservation Strategy that expands on the above comments.

## **Sustainability and Community**

Local government is the closest level of government to the community and best represents the attitudes of the community. Local municipal boundaries and local council politics have hindered the development of cost sharing of service provisions and development of regional integrated community services.

Unfortunately the current state government has publicly stated that there will be no forced amalgamations, nor has it provided an independent and non political debate on the advantages, disadvantages and cost of maintaining the current number of local governments to the community.

For example, at a recent WALGA deputation to Queensland, a Western Australian local government with a population of less than 500 residents was the laughing stock of the Queensland hosts, yet strong parochialism prevents those local governments from taking a leadership role in rationalisation.

## **Greenhouse Gas Emissions and Climate Change**

Many local governments are involved in “Cities for Climate Protection” in an effort to reduce local greenhouse emissions, yet they face constant battles in reducing emissions because of barriers at the state level. For example there is no incentive for local government to be adopting power saving devices on street lighting when Western Power does not provide any incentive for such reductions – all the cost savings go to Western Power, yet Western Power will charge the local government the full capital costs of installing power saving devices. Furthermore there are significant barriers to innovation with Western Power refusing to accept any lighting infrastructure that is not precisely in accord with their standard design.

State agencies and service authorities should be leading by example. If not, others are not going to adopt such principles. The real challenge exists for the State Government to implement such actions as identified in the strategy throughout its state agencies for various actions are already underway at the local level.

## **Education and Implementation**

If local government is to be a key stakeholder and driver it will need to be involved in discussions on progression of such principles. To date there has been little contact with individual local government on such issues, especially with regional councils in the southwest. It is our understanding that the Western Australian Local Government Association has been consulted however these issues have not filtered through to the City. The City requests that it be involved in any future roundtable discussions regarding the progression of the sustainability within local government.

For sustainability to be achieved both the state and federal government will need to incorporate principles through policies and legislation for it to be adopted. Without such an overarching support framework, the principles of sustainability will continue to be adopted in various degrees and levels of success.

Government, through both the commonwealth and the state will need to provide various assistance through education, reforms and incentives for local governments to be able to appropriately adopt such principles. The ability of local government authorities to adopt and implement such principles will depend on the resources that are available, and as is the case with many smaller authorities, such resources, including staff technical advice is unavailable.

The current government was elected with a strong emphasis on its commitments to produce a sustainability strategy, which crosses all levels of government and community. It is the City's understanding that the Sustainable Policy Unit has 1 to 2 staff members on a contract basis for the development of the strategy- what happens after the strategy has been complete? It is not clear at present who will deliver, promote and provide the necessary framework for the strategy to be successfully adopted.

The dissemination of information about sustainability principles and how they can be achieved will be of vital importance to the adoption and understanding of the strategy. Appropriate resources need to be assigned by the government to maintain the current momentum and progress of the many objectives and proposed actions outlined in the strategy.

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2 September 2002

Draft State Water Conservation Strategy- Comments  
Resource Allocation Branch  
Water and Rivers Commission  
PO Box 6740 Hay Street  
EAST PERTH WA 6892

### **DRAFT STATE WATER CONSERVATION STRATEGY**

Thank you for referring the above strategy to the City for comment. The document has been reviewed and the City wishes to express its in principle support for the initiative taken by the state government to develop such a conservation strategy and is in general agreement with the recommendations made however, the following comments have been noted for your consideration.

The strategy states "sustainability is implicit in water conservation" and that the strategy contains a number of recommendations that are designed to increase the implementation of water conservation measures in a manner that is consistent with meeting the goals of sustainability. A major shortcoming of this strategy is that it fails to recognise and address the environmental issues and associated effect that the diversion of water to the Perth metropolitan area, from regional catchment areas has. The true environmental costs in diverting these waters has not adequately been addressed and it is not sustainable for water to continue being diverted into the metropolitan area to continue to support and "top up" a City which is clearly not operating sustainably in regards to its water use.

The unsustainable practice of developing new water resources outside of the Perth metropolitan region that permits further expansion of low-density residential areas in Perth is strongly opposed.

It is acknowledged that water use, especially within the Perth region is important due to constraints that exist in terms of its water supply, however it is clear that it is not sustainable for regional catchments to be depleting local resources to sustain and maintain inappropriate metropolitan planning, development and lifestyle. The diversion of water from south of Harvey for the metropolitan area is not supported. In the current state of affairs regional natural resources continue to be depleted, with significant long term environmental damage. Future urban development should be based on sustainable water supplies within the immediate region.

The City is in agreement that integrated resource planning is vital in identifying sustainable alternatives for water conservation initiatives, however the strategy fails to make mention of State land use planning legislation which has a significant role to play in minimising urban water consumption. State planning legislation does not encourage water conservation principles, current R code zonings, block sizes, subdivision designs and the continual push for urban sprawl, which results in vast amounts of reticulated lawn in areas of public open space all encourage excessive water use, and does not set an appropriate standard for business, industry and general community to follow.

The term " best practice" is referred to in the strategy recommendations. The term " best practice" needs to be clearly defined to provide a clear benchmark for user groups to work towards. For example best practices within the market garden/horticultural sector and industry



clearly needs defining. At present the consumption levels for these activities is excessive and often unnecessary.

It is recommended that the water service suppliers be required to further investigate water conservation measures that could be applied to certain user groups that at present consume excessive amounts of water. Increasing pricing through a user pay type system is a shortsighted solution. The state government needs to go beyond this framework and focus resources on promoting and educating sustainable water conservation practices. The recommendation of a reward system for water efficiency application is supported.

Any water restrictions within the state need to be linked to the unsustainable practice that has created the need for such restrictions to be applied. Severe water restrictions in the Perth metropolitan region should not be applied across the State, as unsustainable practices with the metropolitan area should not penalise other regional areas. Any restrictions that are put in place for regional areas regarding this form of action, particularly within urban areas should be linked directly to their own unsustainable uses.

The City reinforces the need for the state government to publicise and continue to educate the public on water efficient devices and urban water conservation innovation and supports the recommendation to extend water use efficiency programs to regional areas.

If you require any further clarification regarding any of the points raised please do not hesitate to contact Jason Foster, Environmental Planner on 9780 8282.

Yours faithfully

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Greg Trevaskis  
**CHIEF EXECUTIVE OFFICER**