

OUT02/691474 NMC 00619

Keith Boase

3 January 2003

Professor Peter Newman
Sustainability Policy unit
Department of Premier and Cabinet
197 St George's Terrace
PERTH WA 6000

Dear Professor Newman

RE: STATE SUSTAINABILITY STRATEGY

The City of Kalgoorlie-Boulder is pleased to be able to comment on the Draft Sustainability Strategy, which was released in September 2002.

The commitment of the State Government of Western Australia to the development of policies to assist in the transition to a sustainable community is laudable. Whilst the document has covered a lot of ground, it will need considerable work prior to being able to act as an overarching outline to the introduction of sustainability and its concepts within Western Australia.

In order for sustainability to become an issue of major concern to every member of the Western Australian community it will be necessary to spend significant resources on the education and promotion of sustainability. Unfortunately it would appear that the promotion of sustainability has received very little recognition in the document.

The development of local milestones will be a major contributor to community awareness and the empowerment of local communities to deal with issues of sustainability. The implementation of milestones developed by local communities in conjunction with the State Sustainability Strategy, will ensure a sustainable outcome for the whole of Western Australia.

A community is driven by matters that directly impact its way and quality of life; imposition of ideas from a higher level are very rarely successful in changing the opinions and actions of a community. It is necessary to ensure that every community has a significant stake in the development of the document and also of milestones flowing from the document.

As a local government, the City of Kalgoorlie-Boulder is the first port of call for the majority of issues dealt with by this document and as such it is considered that a significant proportion of the implementation of these issues will become the role of local government. In order that local governments throughout Western Australia can ensure the success of the State Sustainability Strategy, significant resources must be placed at the disposal of the third tier of government.

Please find attached a number of comments made by City of Kalgoorlie-Boulder officers, in order to assist you in finalising the State Sustainability Strategy, a document that will over time have a significant effect on all sectors of the Western Australian community.

Yours sincerely

IAN FLETCHER
Chief Executive Officer

Att

Area	Item	Comment
Sustainability and governance	Sustainability assessment	The proposed Social Assessment Unit within the DPI is considered positive but this Unit should be given clear guidelines, which can in turn be given to Local Government to ensure that the matters submitted by local government that the Unit will consider can be addressed by the Local Government in order to minimise potential delays in processing of Scheme Amendments, strategies, Outline Development Plans and other documents reviewed and endorsed by the DPI.
	Institutional change	There is scope for the Sustainability Policy Unit to provide guidance, and to work with, the Local Government Association, particularly disseminating information regarding general policy advice and community education programs.
	Embracing sustainability in government agencies	It is noted that many of the proposed actions will require the input from local government, such as building design and construction, and that the principles of the Sustainability Code of Practice, Action Plan and Sustainability Resource Guide could be beneficial to local government. Local government also plays an important role in administering legislation and therefore should be afforded the opportunity to comment on the draft legislation.
	Partnerships for action	State and local government having common principles, goals, approaches and programs is seen as positive as the local government is pivotal in implementing the State Sustainability Strategy. The Local Government Sustainability Roundtable is also seen as positive, the WAGLRUF, formed by the City's Mayor, is regionally based and has seen many issues identified and resolved for the benefit of the whole region. The involvement of local government in larger development projects would be seen as very positive as the current lack of notification of large development projects to the local government needs to be addressed.

Area	Item	Comment
	Planning for sustainability	The implementation of sustainability planning by local government is already occurring to some degree but it is agreed that there can be more stringent requirements introduced for more effectively support sustainability planning. It is noted that the responsibility for implementing the sustainability principles and guidelines will lie with the local government through the assessment and development approval process. Therefore the need for legislative powers to enforce these requirements is strongly advocated such as modified penalties, which give the ability to issue fines to ensure compliance or penalties for enforcement matters. The proposed Strategic Alliance for Sustainability within the DPI should have local government representation.
	Sustainability in the regions	The proposed regions should follow existing region boundaries (or the existing regions should be modified accordingly) to coordinate with agencies and associations within existing regions. The 'sense of place' documents should also include European heritage and incorporate tourism bodies. The Regional Sustainability Strategies should also take into consideration the regional Planning Strategies that have been developed.
	Indigenous communities and sustainability	<p>Indigenous housing needs should be addressed in that house design should reflect their cultural requirements. It is suggested that Indigenous people should be encouraged into health services for employment opportunities.</p> <p>Development of Indigenous businesses and industries will enhance the sustainability of these communities. Training in all facets of business development will assist this endeavour. Specific target industries, particularly in the mining regions should include, bush tucker, mine-site rehabilitation and exploration works. Through increased Indigenous business and employment opportunities, communities will develop their own sustainable outcomes.</p>
	Research and development for sustainability	Programs similar to the Healthy Country initiative in the South West of WA should be implemented in all regions.

Area	Item	Comment
Contributing to global sustainability	Sustainability information online	The Sustainability online has many positive possibilities such as linking to regional portals. Accessibility to the internet to low income families will need to be addressed such as subsidising computer access in local libraries.
	Recognising sustainability excellence	The Annual Sustainability Award is seen as positive.
	Population, development aid and environmental technology	The development of the Environmental Industries Unit within the DIT and the support for Centres of Excellence and Cooperative Research Centres is seen as positive as the need for recycling is escalating, which is a responsibility that lies predominantly with local government.
	Maintaining our biodiversity	<p>The maintenance of biodiversity is as much cherished by private individuals and philanthropist as by government departments, this needs to be recognised by State Government as of as much if not more importance than preservation of bio-diversity by state institutions. The maintenance of bio-diversity by private individuals is one of the most highly taxed (eg: land tax) industries in Australia, this needs to be addressed at both a state and federal level, to ensure that our bio-diversity in both private and public hands is protected.</p> <p>Nature based recreation and tourism has many positive outcomes for all regions and areas. There should be an initiative introduced to assist private owners of vast properties to protect and capitalise on the biodiversity and ‘sense of place’ while keeping the property economically viable.</p>
	Responding to greenhouse and climate change	The City of Kalgoorlie-Boulder, along with a number of Western Australian Local Governments Authorities have become involved in the Cities for Climate Protection Programme™, in order to reduce greenhouse gas emissions. This will as an aside assist in the reduction of spending on energy consumption. Further assistance is required to Councils to ensure the adoptions of programmes such as the CCPT™ are adopted.

Area	Item	Comment
	Oil vulnerability, the gas transition and the hydrogen economy	Proof of the viability of a hydrogen economy is needed prior to this been seen as a real alternative to the present oil based economy, particularly in remote areas where access and transport of conventional fuel sources is seen as more reliable.
Sustainable use of natural Resources	Sustainable agriculture	<p>In order to ensure the long-term viability of agriculture in the rangeland of Western Australia, a number of thought patterns need to be reconsidered.</p> <ul style="list-style-type: none"> • The concept of pastoral leases need to be revisited to ensure long-term tenure is granted, this would assist with further capital investment in an industry presently lacking confidence as to the risk and return nature of their investments. • Serious consideration must be given by the State Government to the concept of pastoralists as land managers as well as graziers. On-going financial support for land management, rather than grazing would also assist in the revitalisation of local pastoral communities. • Financial support of the state government for the pastoral regions that act as a buffer and quarantine barrier for introduced plants and pests, presently this work falls to the owner of the pastoral lease with limited support by the state government or other spheres of agriculture who are the principal beneficiaries of these works.
	Sustainable fisheries and aquaculture	Aquaculture industry using saline waters also benefit mining communities through rehabilitating open cut mines.
	Sustainable forestry and plantations	Presently largest potential supplier of sandalwood is the goldfields region. There needs to be more than just a management plan for the harvesting of this species. There needs to be an effort made to regenerate the sandalwood through plantations and or propagation of native sandalwood. Research into this potential industry (rather than opportune) would also lead to increased knowledge and employment in the rangelands. The Sustainable forestry and plantations seems very focused on the sou-west.

Area	Item	Comment
	Sustainable mining and petroleum production	<p>Long-term sustainability of mining areas requires the utilisation of abandoned mine sites for other alternative industries – eg: aquaculture.</p> <p>The involvement of local shires as part of the sustainability assessment process is considered important due to the social impact of fly in fly out mining operations on the social and economic environment as opposed to the positive outcomes from integrating the company into the community.</p>
	Sustainable tourism	<p>The indicators/targets for this section is very much growth orientated – sustainability of the resource (environment) has not been considered. Tourists can be extremely damaging to the natural environment, we need to have checks and balances present to ensure the resource is also sustainable.</p> <p>3.35 seems to contradict itself in that it is proposed to accreditate a local government area as a way of demonstrating area-wide tourism sustainability – surely more than one local government would need to be involved for area wide sustainability.</p>
	Protecting aquatic systems	The seasonal aquatic systems also need to be protected and the impact of the development on this system needs to be assessed, for example Gribble Creek in Kalgoorlie-Boulder, highlighting the need for aquatic protection in arid areas.
	Sustainable coastal and marine environments	No comment
	Sustainable rangelands management	Land Administration Act needs to recognise environmental and sustainability issues, not just administration and industry concerns

Area	Item	Comment
Sustainability and settlements	Managing urban and regional growth	<p>The City of Kalgoorlie-Boulder presently has a regional planning strategy that will assist with the appropriate management of urban growth within the Cities environment.</p> <p>The Sustainability Strategies need to be incorporated with the Region and Local Planning Strategies. It is noted that the implementation of the Country Development Program (Land Release Taskforce) rests predominantly with local government. The location of urban development is guided by the state, region and local strategies. The need for sustainable balance in major regional centres is considered important to prevent ‘urban sprawl’ and associated issues within the region.</p>
	Revitalising declining centres and suburbs	<p>Support for the decentralising of industry and commerce will assist in the revitalisation of a number of smaller communities. Development of E-commerce hubs (21st Century infrastructure) in regional areas, to assist in the revitalisation of communities should be fully supported by state government</p> <p>The ‘Reviving the Suburbs’ will require a commitment from local governments as many of the identified initiatives will involve financial contributions from local government and therefore local government needs to contribute to the development of the initiative and the Community Code for Revitalisation. These initiatives should integrate with Liveable Neighbourhoods Code and take into consideration the heritage value of the older inner suburbs.</p>

Area	Item	Comment
	Integrating land use and balanced transport	<p>The City of Kalgoorlie-Boulder has in place a bicycle plan, which is used for the planning and development of bicycle related projects and to encourage increased use of non-motorised transport. Economics of scale present difficulties in providing effective public transport facilities in regional centres compared with the Perth Metropolitan area.</p> <p>The provision of footpaths and bicycle paths and public transport is the responsibility of local government therefore to assist in the provision of footpaths on both sides of any road within a town boundary funding should be provided. The City's Town Planning Scheme has the provision to allow for convenience stores to locate in existing suburban communities but have found that these stores cannot compete with the 24 hour trading facilities and chain outlets. The proposal to cover noise and other environmental issues for all vehicles under the Australian Design Rules is seen as positive due to the impact on suburban amenity. The Integrated Funding Framework with intergraded land use and transport planning are also seen as positive.</p>
	Managing freight and regional transport	<p>The development of a regional inter-medial transport hub, within the goldfields will take pressure of the transport system in the metropolitan region and assist in the delivery of freight to the south-west and Pilbara. Presently a large portion of freight is transported through to the metropolitan area only to be off-loaded and sent back along the route it has just completed, this is a waste of time, money and resources and in no way aligns itself with the concept of sustainability, the introduction of one or more regional inter-medial transport hubs will provide a more efficient regional transport system.</p>
	Preserving air quality	<p>Perth based – fails to include and/or plan for other areas. Also fails to recognise other areas that may be managing air pollution issues well. Buffer zones for industry must be maintained to minimise off-site effects, the reuse of by-products, normally considered to be wastes, should be encouraged in order to minimise off-site impacts as well as minimise resource loss.</p>

Area	Item	Comment
	Reducing and managing waste	<p>The '<i>Towards zero waste by 2020</i>' has been misquoted, reading "elimination of all waste by 2020 rather" than "towards zero waste by 2020'. Misinterpretation such as this may have a detrimental effect on industries perception of where the state government is heading with regard to policy.</p> <p>A target of this section reads – 'reduce resource consumption by a factor of 4 by 2020' – this statement seems very vague, has this yet been benchmarked, how and by whom using what process will the present resource consumption rate be ascertained.</p> <p>The local governments should receive extra funding, or funding incentives, to achieve a reduction in consumption and waste and prepare the comprehensive audit and prepare the waste management plan.</p>
	Our future water	<p>All Western Australian communities should maximise the reuse of all water resources available to them, this should include rain, scheme, grey and effluent water. Kalgoorlie-Boulder is responsible for the sewer system and is presently the largest re-user of effluent water in Australia.</p> <p>The harvesting of stormwater should be a shared responsibility between state and local government.</p>
	Sustainable energy	<p>No mention of support mechanisms to encourage local government/industry to adopt new technology. Seems to be primarily aimed at household conservation and government procurement policy.</p> <p>If the responsibility for the rating system for residential development lies with local government funding should be provided. The application of solar orientation could and should be incorporated into the Residential Design Codes. Energy efficiency for all government buildings should be mandatory not just encouraged.</p>

Area	Item	Comment
	Preserving cultural heritage and landscape and creating 'sense of place'	The review and implementation of town planning schemes rests with the local government. To ensure retention of heritage places there needs to be flexibility and an innovative approach to assessing proposals for redevelopment of heritage places. Therefore economic considerations need to be accounted for and a sustainability approach to heritage preservation, conserving environment, social and economic factors would have many benefits. The Built Environment Policy should ensure flexibility to ensure that the built environment can adapt to the changes and evolution of 'sense of place'. The Built Environment Policy would have more benefits if adopted under the Town Planning Scheme than through the Heritage Council as the Heritage Act would then need to be amended to include non State Registered places.
	Building sustainability	<p>In order to bring about change in the building industry to ensure that maximise renewable energy is available to and utilised by new constructions, financial rewards and support will need to be higher priority than regulation. The recycling of building material, be it in another construction or recycled to create a new product needs to be fully supported, to ensure minimal wastage of materials from construction sites.</p> <p>The production of the Sustainable Construction Guide is considered important, as it will be able to collate the relevant sections of the various documents into a useable formant for the general community. A variety of building materials should be encouraged through incentives.</p>
Sustainability and community	Community services and development	<p>A sensible balance needs to be struck between community services and community needs. This balance is best achieved at a local level with the resource support of state government.</p> <p>The need for Regional Councils to create Regional Integrated Community Services Plans is considered positive but adequate resources should be made available.</p>

Area	Item	Comment
	Housing and sustainability	Sustainability in housing should reflect the community in which it is being developed.
	Sustaining healthy communities	Communities need to be built around facilities to ensure the needs of the community are met. Primary health care is of concern to communities and access to these facilities is of vital importance. Community health is a reflection of the regions health, necessitating the support for fledgling industries as well as established industries.
	Education and community awareness for sustainability	In order to educate for an awareness of sustainability in any community a partnership needs to develop between the perceived educators and all levels of government. As sustainability is principally of regional concern it is necessary to have the educators and the local government as the primary focus.
	Sustainability through culture and the arts	<p>How a community embraces culture and the arts, from all spheres of life will dictate the attitudes of that community.</p> <p>Regional arts programs, either community based or local government based need funding to ensure that they continue and grow especially those based on cultural heritage new products and entrepreneurship.</p>
	Multiculturalism and sustainability	Continued education with the inclusion of culture, arts, religion etc, will encourage communities to be accepting of various cultures.
Sustainability and business	Training and facilitation for sustainability	In order to train for, and facilitate the community towards a more sustainable future considerable support and resources are required. A programme preaching sustainability centred in Perth will have limited acceptability to regionally based communities. It is necessary that sustainability be seen to be a regional issue being tackled by the region with the support of the state governments, not state government lead.

Area	Item	Comment
	Financial reform and economic instruments for sustainability	<p>Triple bottom line accounting within government budgets, not just pure financial</p> <p>Enterprise facilitation to ensure there are developmental and community based approaches to enterprise facilitation should be facilitated by local governments with the assistance of the state government.</p>
	Eco- efficiency and industrial ecology	<p>Opportunities exist in all industries to benchmark present operations and develop plans to improve efficiency and decrease ecological footprint. By establishing the benchmark first, a history of improvement is available at any stage in the evolution of the industry.</p>
	Industry sustainability covenants	<p>No comment.</p>
Implementation		<ul style="list-style-type: none"> • The development of regions needs to be considered carefully to ensure maximum synergies between the communities and industries involved and the existing regions. • The three tiers of government have to approach sustainability together to ensure that maximum acceptance is achieved in the shortest time frame. • Community drivers for sustainability will ensure its success, imposition from a state government organisation will create conflict and antagonism rather than sharing and acceptance. • Triple bottom line accounting needs to be included in all government operations with a strong emphasis on the social and environmental issues. • Milestones need to be set by local communities in order to assist the communities to determining what support is required to build sufficient capacity within the community to fully support sustainability. • Industry must be encouraged to assist communities in the building of social capital, as this is the basis of their workforce and thus their long-term survival. <p>Implementation will rely heavily on local government through the Statements</p>

Area	Item	Comment
		of Planning Policy. Need legislative power to enforce provisions through appropriate penalties (ie fines). State Sustainability Strategy should integrate with regional and local planning strategies.