

Enquiries: Trina Anderson 9267 9068
E-mail: anderson@swan.wa.gov.au
Fax: 9267 9444

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Sustainability Policy Unit
Department of Premier and Cabinet
15th Floor Governor Stirling Tower
197 St Georges Terrace
Perth WA 6000

Dear Sir / Madam

City of Swan Comments – draft State Sustainability Strategy

Please find attached the City of Swan's comments on draft consultation State Sustainability Strategy. For ease of reference, comments have been made in two areas; general comments relative to the whole document and specific comments relative to the various sectors as indicated.

The City of Swan places a high priority of the concept of Quality of Life and sustainability in its community, and in doing so has undertaken an ambitious project to assist in the improvement of the quality of life for residents through better planning. *Foundations for the Future, Quality of Life in the City of Swan* proposes a set of ideal goals that provide for a high level quality of life for the community, based on the concept of sustainability. This document and associated framework has been recognised on a national level by the recent National Office of Local Government Award for LA21 / Sustaining Our Communities.

Local government recognises it is well-placed in its community governance and planning role to promote sustainability, and most local governments are pursuing the sustainability agenda with vigor. The City does not believe, however, that local government can continue to bear the weight of the continued transfer of responsibility from State government, or be able to respond adequately to uncoordinated demands of State government agencies, without consideration of the increased resources required at the local level. This is a key point being made in the attached City of Swan submission.

The City of Swan would like to take this opportunity to commend the current Government of Western Australia, Premier Gallop, Professor Peter Newman and the Sustainability Policy Unit of the Department of Premier and Cabinet on this progressive document, and the significant initiative towards guiding Western Australia towards a sustainable future.

The City of Swan hopes the attached comments are useful in formulating the final document and looks forward to continued involvement in the development of the final State Sustainability Strategy.

Yours sincerely

Eric Lumsden
Chief Executive Officer

SUBMISSION ON THE STATE SUSTAINABILITY STRATEGY CONSULTATION DRAFT

**CITY OF SWAN
DECEMBER 2002**

Key Points

1. The need for further development and measurement of reliable performance indicators in order to measure progress towards identified outcomes.
2. State and Local Government both having a role in the educating the community and encouraging the application of sustainability principles to decision making, in building the community's capacity and understanding.
3. The draft Strategy must have realistic expectations of the resource capacity (and limitations) of local government.
4. There needs to be a commitment to continued structural change in state government administration, relations and funding mechanisms, and a holistic approach by state agencies in developing strategies and determining responsibilities.
5. The incorporating of sustainability objectives into legislation, examining legislation holistically and amending holistically to achieve integration.
6. Commonality of local sustainability frameworks with the state framework is needed for a consistent approach to sustainability and its measurement. Integration at all steps within the planning and delivery cycle would provide greater opportunities for sustainable outcomes, as well as major efficiency gains.
7. Recognising the valued role of partnerships to deliver the goals of the draft Strategy, not the devolution of responsibility.
8. The nature of political cycles requires the development of long term visions and frameworks independent of this cycle, this is essential in maintaining an ongoing commitment to sustainability.

General Comments

- A key concern of the City of Swan is a recognition in general in relation to the intent of the draft Strategy, is the limited capacity of local government to take on more responsibility, given the many local governments in Western Australia, have a very limited resource base. State government needs to ensure that local government is adequately resourced to take on its proper role in sustainability. Local Government resources are also often stretched unnecessarily in trying to deal with the sometimes conflicting demands of the community and State agencies, which often have functional, rather than integrated approaches, that limit our ability to deliver sustainable outcomes.

- There is a need to clearly define how the Sustainability Policy Unit relates to the other arms of government as well as the role and function of the proposed sustainability units within existing departments. Are these units only being proposed within State governments? Most or all state agencies should commit to having similar units to address sustainability issues.
- The process for planning, environmental planning and development approval, and how the Sustainability Policy Unit will contribute to sustainability needs to be clearly stated. Importantly, it is not clear how all stakeholders are to achieve social, environmental and economic integration having regard to the eleven principles, six long-term visions and goals and forty-two foundation principles outlined in the report.
- The key indicators needed to achieve the triple bottom line need further developing before they can be used as sustainability benchmarks for assessing performance against the triple bottom line. In this regard Table 1 (page 32) requires further breakdown.
- The draft strategy report provides very little in the way of planning tools that could assist stakeholders in reaching a decision about a development or a planning process that contributes to sustainability. For example, a useful step forward might be to show by way of examples how the tools for sustainability outlined in page 33 of the report might be used to achieve the triple bottom line of environmental, social, and economic dimensions.
- A current issue that will need to be addressed which is extremely relevant to the draft Strategy is the clear definition of the roles and responsibilities of key agencies (DEP, DPI) with regards to approvals, conditions and ultimate responsibility for enforcement. This is particularly important in the environmental sector.
- The inclusion of sustainability objectives into key pieces of legislation to give the statutory 'backbone' necessary to the concept. The current amalgamation of planning acts is a key opportunity that should be taken advantage of.
- The principal and often implicit issue that should be expressed in the final version is the high level of integrated co-operation and co-ordination required to ensure that the many worthwhile objectives and actions are effectively implemented. This will require a substantial revision of the established State / Local Government / Regional Councils relationships and compartmentalised operational fields.
- The draft Strategy provides a challenging and visionary definition of sustainability. The definition implies for example that "an activity that only addresses two of the dimensions simultaneously (say provides both economic and social gains but "trades off" the environment) is ultimately unsustainable."

Specific Sector Comments

Sector 3 - Sustainability and governance

Sustainability Assessment

- The possible criteria for sustainability assessment of projects, plans, policies and programs outlined in Table 2 (page 37) needs to be carefully developed. It is critical for the report to demonstrate how a particular technique can be used as an aid to decision making "... which integrates social, economic and environmental factors and can incorporate the principles of sustainability." (See page 37)

- Although ‘There is no single preferred approach and each jurisdiction must build on the unique legislative and institutional machinery...’ resource and experience limitations in agencies must be recognised. The development of a common framework and assessment mechanisms would go along way in assisting various bodies in incorporating the concept into the strategic planning and operational frameworks of organisations.

Partnerships for Action

- There is a focus on the establishment of regional councils to deliver Regional Sustainability Plans and ‘Sense of Place’ documents. Although in principle this is supported, the practical implementation issues in relation to regional councils need to be considered. This includes, the significant differences in rate base and resources between regional local authorities, the perception as another ‘layer’ of local government and the difficulties in coordinating priorities of various local authorities. A regional arrangement coordinated by and between local authorities to address a specific purpose (such as a Regional Sustainability Strategy) would be less resource consumptive and more flexible than a permanent, long term body. Many Regional Council’s have been developed on the basis of waste management, this is not necessarily the common theme or sophisticated grouping required for regional councils.
- The role and process for a State-Local Roundtable should focus on equal partnership. The recent plethora of state strategies and new legislation emphasise the ‘partnership’ with local government, that can be interpreted to mean devolution of responsibility. This issue needs to be holistically identified across the state agencies and addressed. Local governments are experiencing increasingly sophisticated service demands from the community and is not in a place to also extensively resource a number of strategic initiatives from state agencies, who are best placed to resource and implement these recommendations.

Embracing Sustainability in Government Agencies

- The development of a Sustainability Action Plan is a significant step towards incorporating Sustainability principles into agency programs and activities. It must be ensured that the focus of these action plans is not only environment but broad also considers the social and economic implications of their operations.
- The Sustainability Code of Practice will assist in some consistency in policy making and practices that will be needed to guide these agencies through the familiarization stage of the issue.

Planning for Sustainability

- Town Planning Schemes are an important mechanism for addressing sustainability issues in the statutory processes. Although there are a number of LGA’s who have embraced the LA21 program, the difficulty in incorporating this into scheme mechanisms becomes apparent when looking at the limited legislative opportunities supporting sustainability, and the ‘on-ground’ resourcing the application of the outcomes of these principles. Statements of Planning Policies are useful documents, but sustainability objectives must be included in guiding legislation such as the TP&D Act, and in the State Planning Strategy. Additionally these principles must be strongly supported by state agencies responsible when assessing proposals and setting conditions.
- Statements of Planning Policy are still traditionally ‘siloe’d’ into the sectors as identified in Figure 3. Objectives within SPP’s within sectors will need to reflect sustainability principles.
- Although a recognised as a key mechanism, it must be remembered the TP&D Act is primarily a public health and land use piece of legislation, it may not be within its

capacity / contradictory to also address sustainability principles, new legislation or holistic legislation may be required.

- The report will need to identify deficiencies in existing legislation and identify the extent to which legislation requires amendment to achieve the triple bottom line. In other words legislation needs to be examined holistically, and amended holistically to achieve integration. A piecemeal approach that focuses only on one piece of legislation such as the *Town Planning and Development Act 1928 as amended* will not suffice.
- Perhaps a role of the Sustainability Policy Unit is to examine various reports and statements of planning policy (see page 55 of the report) including legislation with a view to identifying the extent to which the criteria for sustainability assessment of projects, plans, policies and programs are being achieved. (See page 37). This perhaps is where the careful selection and use of indicators and targets may be used to assess and validate the extent to which planning processes contribute to sustainability.
- The draft Strategy has increased assessment requirements for Planning and Building sections to achieve sustainability outcomes – this will need State Govt to review mandatory assessment periods and support environmental conditions placed upon developments. All developments should be assessed against a standard rating system (eg. NABERS) and should comply with a certain star rating level - enforced by the WAPC.
- The proposed integrated, regional and more formalised (SPPs) planning approaches are worthwhile, but high levels of integrated co-operation and co-ordination (including responsibility, management and resourcing issues) , will largely determine the success or otherwise of proposed objectives and actions.
- An example of an attempt to address the issues of formal structure of responsibilities and management is the Queensland Integrated Planning Act and the attendant administrative / management mechanisms.
- In the draft Strategy examples of integration, regional, and formal planning mechanisms (SPPs) are suggested as follows:
 - Integrated Funding Framework (land use and transport, p. 142)
 - the development of Statement of Planning Policies eg Integrated Land Use Planning and Transport, (p.146)
 - The Regional Sustainability Strategies ('sense of place', p. 159) ,
 - Sustainable Planning, Building, and Construction Guide - State-Local Govt Sustainability Round Table (p. 162)
 - Develop a Policy on Regional Integrated Community Services based on Regional Councils creating Plans...(p. 169)
 - Develop a Statement of Planning Policy on Public Housing, Community Housing and Affordable Private Housing (p. 173)

Sector 4 - Contributing to global sustainability

- Emerging nations such as Malaysia and Indonesia whilst appearing to embrace sustainability have yet to reflect the principles of sustainability into legislation. A site visit to Pointeanak or Kapit on the Island of Borneo will demonstrate a range of unsustainable practices such as extensive clearing of rainforests, and the replacement of rain forests with unsustainable plantations. Often these practices result in highly polluted rivers from direct flow of sewerage into rivers and mangroves, extensive use of pesticides, and land clearing practices.
- More work is required in assisting less well resourced South - East nations to achieve sustainability and to build on the work of others. For example, Denmark through

DANCED is actively involved in promoting sustainability throughout South - East Asia. Yet the draft State Sustainability Strategy Report makes no reference to the Danish effort in promoting sustainability, or links to promotion of the concept to close neighbouring countries where numerous significant environmental, social and economic interests lie for Western Australia.

- More needs to be done in spelling out the indicators and targets (see page 84).

Sector 5 - Sustainable use of natural resources

- Key local government environmental initiatives are not discussed in the document ie. Cities for Climate Protection, Perth Biodiversity Project, support of catchment & 'friends' groups (little mention made of the work these groups do in general), and used as examples of potential mechanisms / leverage for sustainability at the community level. Recognising and capitalising on successful programs will be vital in delivering the recommendations of the draft Strategy.
- More work is required on indicators and targets - who will be responsible for measuring? - Are these the most appropriate indicators / readily obtainable? How often will indicators be reported on and do they feed into compulsory regular State of the Environment reporting process for State & Local Govts.
- There is an additional workload and responsibility being placed on local governments by the State in terms of environmental planning & management, eg. the downgrading of noxious weeds and making individual Council's responsible for determining - and enforcing action against - those environmental weeds in their LGAs. This is not a sustainable outcome – due to resource limitations some local governments will pick up, but many will not be able to.
- Continual research and information needs to be made accessible to local governments and their communities in regards to environmental issues.
- Many actions are listed - there could be a bit more consistency / cohesion between these.

Sector 6 - Sustainability and settlements

Revitalising declining centres and suburbs.

- It is worth noting that while 'Reviving the suburbs' trial is a good idea, such projects are limited in number because of lack of finance or funds to progress such projects. Perhaps as a demonstration project, the draft consultation State Sustainability Strategy Report should carry out an evaluation of the Eastern Horizons Project and recommend what measures need to be put in place to achieve a more sustainable suburb?
- Page 138 makes reference to a model for measuring the relative performance of suburbs against design and sustainability indicators. This model needs to be included in the report and the design and sustainable indicators spelt out in detail. How do you measure a suburb in a state of decline?

Integrating land use and balanced transport.

- The vision, objectives, proposed actions have merit and some ideas such as increasing new dwellings within one kilometre of a rail station are being investigated by the Midland Redevelopment Authority.

Managing freight and regional transport.

- More explanation needed of the multi criteria process. (see page 143)

Sustainable energy.

- Generally agree, however the Building Code of Australia will also need to be modified to achieve the vision identified in the draft sustainability Strategy Report.

Preserving cultural heritage, landscapes and creating "sense of place".

- Grossly inadequate.

Building sustainably.

- Same comments as outlined in sustainable energy apply.

Sector 7 - Sustainability and community

- The State Sustainability Strategy is a very large document and in a way piecemeal from a community perspective. Most of the issues to do with better services to the community are covered in the Governance Section ie suggested changes to the way that Government funding is distributed to programs/ projects etc. There needs to be greater focus on coordination of funding options between Government agencies so that not-for-profit organisations can access funding grants to meet the desired outcomes for local communities through one co-ordinating agency. The existing process for community service/project funding is currently program and output focussed with extensive compliance and reporting requirements from both a service delivery and fiscal perspective. Additionally, small not for profit organisations are required to submit to several funding agencies to accumulate sufficient funds to achieve the economy of scale required to achieve long term operational survival.

Housing and sustainability.

- Local government is not a Redevelopment Authority and is not in a position to provide public housing, but does perhaps have a facilitation role.

Sustaining healthy communities

- Greater need to focus on social determinants as recognised and encouraged by WHO
- Need to realize that the Health System is unsustainable, ie the focus on treatment is unsustainable and need to shift more to prevention and wellness. Removing the causes of sickness.
- Commendation for the concept of incentives and disincentives in promoting healthier lifestyles. This concept needs to be pursued.
- Urge to focus on identifying proactive strategies that promote and enhance as well as address reactive issues.
- Concerned at indicators or longevity of life – is this sustainable and at what cost, what about the quality of life. This is not a good indicator on its own without context and clarification.

Sustainability through Culture and the Arts

- This section is heavily weighted towards a 'community arts' perspective and is 'inward' looking (ie it makes almost no effort to discuss opportunities on a national or international level.) It refers once to interstate touring and there is a small paragraph headed Global Opportunities that talks about arts agencies (but not artists) plus the WA Museum forming links with communities in the Indian Ocean region. This is lacking in any vision on a large scale.
- It is suggested that the discussion needs to be opened up to examine potentials on national and international (and not just local or regional) levels.

- There might also be scope for engaging with the Education sector and the Media in developing initiatives that might 'embed arts and culture in sustainability' but neither is addressed.

Sector 8 - Sustainability and Business

Training and Facilitation for Sustainability

- The focus for sustainability training is at the TAFE level. As part of the implementation program there needs to be recognition of the importance of flexible delivery methods tailored to businesses rather than standard TAFE delivery mechanisms to ensure businesses are engaged in the training.
- With regards to the indicator for this goal area rather than 'the number of new TAFE courses in sustainability areas' the focus should be on the uptake of courses. Some of the other indicators also need to be more integrative/holistic to accurately assess progress against the objectives.

Financial Reform and Economic Instruments for Sustainability

- As part of the broader objective of promoting innovation to WA businesses, access to innovation funding needs to remain to ensure that development of sustainable technologies and practices continues to happen, as the slower reform of investment practices, subsidies and policies is occurring.
- Page 25 of the Strategy notes 'the fastest growing sector of the global economy is the development of environmental technology...'. Given the importance of the commerce sector to Western Australia's economy, significant investment by the State Government should be investigated to position Western Australia to attract this business type and take full advantage of this trend.

Eco-efficiency and Industrial Ecology

- An action that may be useful to be included in this goal area is a more general action to have eco-efficiency principles incorporated into the planning and development process for industrial areas. This may be an area where Local Government has a role to play.
- It is important that WASIG not only focuses on encouraging the adoption of the cleaner production statement by government agencies but that maintains its focus on working at the business level providing one-on-one assistance.

General Comments on Implementation:

- The strategy should be commended for the proposed actions as they are proactive focussing on training, education, information provision, as opposed to more regulatory and control mechanisms which is how change in business practices has been directed in the past. However, some of the proposed actions are relatively high level with out a clear indication of how they will translate into practical applications for businesses. This issue needs to be addressed as part of the Implementation Program when it is developed.
- Similarly, the strategy indicates that a State-Local partnership will be developed and responsibilities for implementation specified in the Implementation Program. Will the roles be clarified in consultation with Local Government or will the report dictate responsibilities to LGA's?
- Also the Strategy identifies the use of Local Government statutory planning mechanisms, in conjunction with State processes, as a tool for implementing sustainability. If Local Governments are to regulate businesses as part of their

statutory planning processes will adequate resources be provided to ensure this takes place in an effective manner?

Sector 9 - Implementation

- More effort is required to formalise partnerships and the principles of sustainability into the statutory process, as well as reviewing legislation holistically to achieve social, environment and economic integration.
- More effort required addressing issues via statements of planning policy, other statutory mechanisms or local government plans. (see page 211), given its suggested role as a key mechanisms for implementation.
- Support the idea of maintaining and creating sustainability units in state and local government. Also support an ongoing role for the sustainability Policy Unit, backed by legislation.