

# **Submission by the Department for Planning and Infrastructure**

## **On the**

### **Draft State Sustainability Strategy**

#### **Background**

The Draft State Sustainability Strategy (DSSS) was released in September, 2002 for public comment. The Draft Strategy was the result of a process initiated by the Premier, the Hon Dr Geoff Gallop, MLA in December 2001. The preparation of the DSSS was assisted by input through public seminars, submissions and public exhibitions.

#### **Context**

The DSSS is a comprehensive all encompassing document. The written report extends to nearly 250 pages and is supported by additional Background Papers, Case Studies and other documentation.

There are nearly 250 recommendations.

The DSSS was drafted by the Sustainability Policy Unit (SPU) of the Department of the Premier and Cabinet.

The DSSS has been the topic of considerable discussion in the local community since its release. It has also occasioned comment from outside of Western Australia.

The Department for Planning and Infrastructure (DPI) is a relatively new agency which has been formed from the amalgamation of the former Ministry for Planning and the Department of Transport. The major strategic purpose of this amalgamation was to increase the integration of the Government's planning and transport activities.

DPI was involved in the preparation of the document to the extent that there were numerous discussions between individual DPI officers and officers from the SPU. It is understood that some of the concepts and proposals in the DSSS may have originated and/or benefited from these discussions.

However DPI made no formal official submission during the preparation of the DSSS.

Since the release of the DSSS there has again been some DPI involvement with the Strategy. DPI officers have had numerous discussions with the SPU. They have also been involved as participants and, in some cases, workshop leaders and facilitators at the Public Workshops which have been conducted by the SPU to obtain public comment on the DSSS.

*Comments by the Department of Planning and Infrastructure  
on the  
Draft State Sustainability Strategy*

DPI and the Western Australian Planning Commission (WAPC) also conducted a full day Workshop to discuss sustainability concepts and their significance for the planning system. This workshop was attended by some 50 representatives of key planning stakeholder groups, including DPI staff.

WAPC has submitted a separate and comprehensive comment on the DSSS as a result of a resolution at the February 25<sup>th</sup> meeting of the Commission. DPI officers were involved in the preparation of documentation considered by the Commission members at that meeting.

## **DPI Position**

DPI strongly supports the concepts of Sustainability and the general thrust of the DSSS. The extent of that support can be gauged by the actions which have already been initiated by and through the Department. These are outlined below.

## **DPI and Sustainability in Practice**

The predecessor agencies of DPI – the former Ministry for Planning and the Department of Transport – have been engaged in developing and implementing a wide range of policies, programmes and targeted initiatives which have been and continue to be based on the concept of sustainability.

To a very large degree sustainability has been and must continue to be embedded in all the work of DPI.

The WAPC submission outlines comprehensively the fundamental role that sustainability has played in the Commission's work. As noted in the Statement of Planning Policy No. 8, the primary aim of planning is "to provide for the fair, orderly economic and **sustainable** use and development of land".

To this end the Commission, DPI staff and their projects have played an important part in raising sustainability issues. Of these perhaps the Livable Neighbourhoods initiative is the most widely known in the community.

However the Commission's work in the various Statements of Planning Policy have also been significant.

There have also been numerous transport policy, planning and specific project initiatives which have been based on sustainability concepts. Perhaps TravelSmart is the most widely known of these activities.

Despite this long and substantial history of involvement in sustainability initiatives, DPI acknowledges that there is always more that can be, should be and will be done. The very brief outline above is not intended to convey the impression that DPI is not committed to improving its performance in this area.

*Comments by the Department of Planning and Infrastructure  
on the  
Draft State Sustainability Strategy*

## **Definition of Sustainability**

The ultimate definition of sustainability to be used will be a key issue for the final Strategy and for Western Australia.

The WAPC submission points out the difference between the ‘balance’ approach inherent in their work, and the ‘simultaneous’ approach in the DSSS definition. The WAPC submission goes on to point out the practical difficulties which may be faced on a day to day basis by decision-makers operationalising the DSSS definition.

This apparent difference leads to comments on two points which will be key issues for the success of the final Strategy.

- It is imperative that the definition represents a single philosophical basis that is widely accepted throughout the community; and
- The Final Strategy must have an ‘operational focus’ so that the general community, as well as decision makers in industry, government and elsewhere can see clearly and unambiguously the implications of implementing the principles.

Informal discussions by DPI with various industry and community stakeholders have raised these points as key underlying issues which must be resolved for the final Strategy to be successful. While the DSSS points out that “Sustainability is fundamentally a fuzzy concept” and then attempts to give it “meaning for Western Australia”, more work needs to be done to make this meaning clearer.

Whatever the final definition, it is important that any necessary legislative changes are made concurrent with the proposed implementation of the Sustainability Strategy. Coordinated implementation across the community will be essential to have a common understanding of what we are working to achieve.

## **Scope of the Strategy**

The DSSS is an extremely wide ranging and far reaching document.

To a large degree this is inevitable because sustainability is an underlying, or foundation concept. It is important that the concept is built into the way we all work, live and play. It must be all-embracing.

However this necessarily all-embracing nature of sustainability raises some potential weaknesses in the Strategy. By covering so much ground –from transport to ethics, from local to global, from community to business – the DSSS leaves itself open to criticism of being ‘all and nothing’.

It is important that the scope of the sustainability concept is retained so that it is clear that sustainability is not an ‘add-on’. However it is suggested that the final Strategy focus on some key or priority areas, strategies, goals and actions as a way of focussing and mobilising implementation energies of Government agencies, industry and the community.

*Comments by the Department of Planning and Infrastructure  
on the  
Draft State Sustainability Strategy*

## **Sustainability and Planning**

DPI strongly supports the DSSS focus on the significance of the planning system to give effect to sustainability principles.

However there is some concern about the extent of the emphasis of the planning system and the implementation details which are yet to be made explicit.

The DSSS makes many recommendations which will need further clarification. The WAPC submission draws attention to this point and this is supported by DPI

The DSSS proposed a key role for Statements of Planning Policy (SPP). DPI does not necessarily oppose the extended role for SPP. However DPI does not believe that SPP are in themselves a possible panacea. While they place an obligation on the planning system, the DSSS itself points out sustainability is very much about attitudes. It is quite possible that regulating may not of itself produce any change at all. It would be an extremely poor outcome if there were to be a proliferation of new SPP which just added to the administrative burden within the planning system with no discernible impact on sustainability outcomes.

The scope of the DSSS proposals goes beyond the scope of SPP which are currently envisaged by the WAPC. Given the legislative responsibilities of the WAPC this proposal needs to be the subject of full and careful consultation and discussion between WAPC and the SPU.

DPI also strongly supports the need for ongoing general consultation between DPI officers and the SPU to both assist the development of the Strategy by SPU, and assist DPI with implementation. DPI would be happy to work with SPU to explore avenues to facilitate this in an appropriate way.

## **Sustainability and Local Government**

The DSSS proposes a significant role for local government. This ranges from the formation of the State-Local Government Roundtable to participation in various Regional Councils.

There is a related 'regional' focus in the proposed initiatives for Regional Sustainability Strategies and actions with Regional Councils. Regional Development Commissions are also involved.

DPI and its predecessor agencies has a long tradition of regional work. DPI strongly supports this perspective. However it is essential that these regional activities are placed within a coordinated, whole of government approach and not fragmented. There is a need for the overall regional focus of the DSSS to be clarified and perhaps some of the initiatives to be brought together within a transparent and existing framework.

DPI and its predecessor agencies also have a long tradition of working with local government. This arm of Government is well placed to deliver some initiatives.

***Comments by the Department of Planning and Infrastructure  
on the  
Draft State Sustainability Strategy***

However there is a concern that there is an over emphasis placed on the intended quantity and scope of work that local government is to carry out. It is not at all clear that local government is well placed or indeed willing to take on these responsibilities.

It would also seem likely that if they were to assume some of these roles they would be seeking additional funding from the State Government. If this were to occur it could lead to either the State funding similar activities in two tiers of Government agencies, or cutting back on funding to State Government agencies while still expecting similar levels of service delivery.

This issue is referred to more broadly below.

## **Sustainability and transport**

DPI has enthusiastically embraced the sustainability and transport elements of the DSSS.

The Minister for Planning and Infrastructure announced on January 27<sup>th</sup> the Sustainable Transport Energy Programme (STEP). This included

- A trial of bio-fuel in Transperth.
- Purchase of 20 Toyota Prius cars by DPI to trial the operations and impact of hybrid technology.
- Routinely purchasing 4 cylinder vehicles for the portfolio car fleet in order to reduce greenhouse and other environmental impacts, unless a larger engined vehicle is required for operational or corporate purposes.
- Purchasing greenhouse offsets for DPI vehicle fleet operations.
- The formation of a Transport Energy Strategy (TES) Committee to provide policy options, strategies and advice to the Minister regarding future transport energy supplies and security for Western Australia.
- Trial of hydrogen powered fuel cell buses for Perth.
- Conducting international conferences and similar events relating to transport energy in Western Australia.

Some of these initiatives relate directly to recommendations in the DSSS.

DPI has made considerable progress with these initiatives.

The TES has been established and is due to report to the Minister by the end of 2004. This initiative will undertake the tasks of the Oil Vulnerability Taskforce referred to in the DSSS, plus have a wider brief.

Transperth has called tenders for the bio-fuel trial and it is due to commence in the near future. Discussions have been held with the Commonwealth Environment Australia agency and other agencies in Western Australia and nationally to maximise the opportunities for collaborating and sharing learning.

***Comments by the Department of Planning and Infrastructure  
on the  
Draft State Sustainability Strategy***

Purchase of the Prius vehicles has commenced and the full batch is programmed for purchase in 2003.

Procedures for implementing the routine purchase of DPI vehicles with 4 cylinders are being drafted and the policy is effectively in place now.

The Fuel Cell Bus project is fully funded and the buses are due to arrive by the end of July 2004.

Perhaps the most significant outcome is the leadership effect of the role that DPI has taken. These initiatives are now being picked up by numerous other agencies and are being considered by the State Supply Commission as part of its Sustainable Procurement Policy development, and the Department of Treasury and Finance in its role as overall manager of the Government vehicle fleet.

The initiatives are also being considered by groups working to the Cabinet Standing Committee on Greenhouse.

## **Sustainability and budgetary implications**

DPI will continue to enthusiastically embrace sustainability initiatives.

Many of the initiatives suggested in the DSSS were already in train or have been initiated since the Draft Strategy was released. DPI has a strong Sustainability focus in its Corporate Directions 2003 – 2005 document released recently, and this will be supported by a Unit in the new organisational structure.

However many of the initiatives already underway, as well as those intended to be undertaken by DPI or proposed by the DSSS, will require additional resources from Government. Some which have the potential to play a major immediate and long-term impact on developing a sustainable Western Australian community continue to struggle from lack of funds. TravelSmart is an obvious example.

The DSSS proposes additional initiatives which will need to be resourced either by DPI ceasing to undertake some current activities or by additional resourcing.

As it stands, the DSSS does not give sufficient guidance to be able to prioritise focussing of resources and actions. This important additional work should be included in the final Strategy as a guide to DPI and to Government.

## **Conclusions**

- DPI believes that the DSSS is a landmark document which puts sustainability clearly as a whole of government priority. DPI has taken a lead in Government with its continuing work in this area, its new initiatives and the way it is embracing sustainability in its new Corporate directions document 2003-2005. DPI's commitment is clear through the numerous initiatives proposed or currently under way and can be seen to be taking a lead role in enthusiastically embracing the sustainability and transport elements of the DSSS into the future.

***Comments by the Department of Planning and Infrastructure  
on the  
Draft State Sustainability Strategy***

- DPI believes that the final Strategy will be enhanced by clarifying many of the concepts in the planning and land use areas of the DSSS, particularly with respect to practical implementation.
- It is important that the final Strategy, when it is released by Government, contains clear priorities for actions and links to resourcing commitments by Government.