10 January 2003

Ref:71002/58:SE523

Professor Mr Peter Newman Director, Sustainability Policy Unit Policy Office Department of the Premier and Cabinet 15th Floor, 197 St Georges Tce Perth WA 6000

Dear Peter

EMRC SUBMISSION ON THE STATE SUSTAINABILITY STRATEGY

Thankyou for the opportunity to comment on the State Sustainability Strategy for Western Australia.

Please see attached the submission prepared by the Eastern Metropolitan Regional Council (EMRC) on behalf of the EMRC and its member Councils: the Cities of Belmont, Bayswater, and Swan, the Town of Bassendean and the Shires of Mundaring and Kalamunda.

The EMRC, at its meeting of 5 December 2002, resolved the following in regards to the above.

"That Council endorse the EMRC submission on the Draft State Sustainability Strategy – Focus on the Future Report".

I trust this submission will assist in developing the State Sustainability Strategy, particularly with regards to issues relevant to Local Government. The EMRC looks forward to working with the Sustainability Policy Unit towards achieving a sustainable future.

Please contact Sandi Evans on 9479 4808, if you would like to discuss any aspect of the submission.

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Yours sincerely,

MICK McCARTHY Executive Manager Environmental Services

Encl: Submission on the State Sustainability Strategy



SUBMISSION ON THE WESTERN AUSTRALIA STATE SUSTAINABILITY STRATEGY CONSULTATION DRAFT

Prepared by the Eastern Metropolitan Regional Council (EMRC) December 2002

This submission has been prepared and lodged by EMRC officers on behalf of the EMRC and its member Councils: the Cities of Belmont, Bayswater and Swan, the Town of Bassendean and the Shires of Kalamunda and Mundaring.

The EMRC and its member Councils are keen to provide input into the development of the strategy and work together towards achieving a sustainable future. Officers from the EMRC and member Councils are already active in a range of forums related to sustainability, some of which are formally recognised for further development in the State Sustainability Strategy to ensure Local Government involvement.

The EMRC generally supports the draft State Sustainability Strategy ("the strategy") and commends the Sustainability Policy Unit, Department of the Premier and Cabinet for undertaking this important initiative aimed at achieving a sustainable future for Western Australia.

As identified in many actions contained in the strategy, Regional Councils and Local Governments are well positioned to assist the State Government in the delivery of the strategy. The EMRC is already very active in regional projects that are facilitated on behalf of member Councils and has a formalised structure that is able to support sustainability.

This is reflected in the EMRC's Mission Statement,

"The Eastern Metropolitan Regional Council, by partnering with member Councils, facilitates strategies and actions which provide services for the benefit and sustainability of the region."

The implementation of the strategy will have significant implications for the Regional Council, the member Councils and Local Government in general. It is essential that the role envisaged for Regional Councils and Local Governments are supported by the State Government in terms of funding and resources. Without adequate funding and resources, it is unlikely that Regional Councils or Local Governments will be in a position to actively participate in the implementation of the strategy, given that they

are already fully committed providing existing services and facilities to their communities.

It is understood that the Department of Premier and Cabinet will be prioritising actions for short and longer term implementation based on feedback received during the public consultation period. It is strongly recommended that Local Governments are further consulted in this priortisation process and that the State Government provide financial support to facilitate Local Governments active involvement in implementing relevant sustainability actions.

The funding and resource arrangements, together with effective working partnerships between the State Government and Local Government, will be critical in the success of the strategy.

It is recognized that many actions in the strategy are most effectively delivered at the community level. Many actions are already being undertaken by the EMRC and the member Councils to progress sustainability in the Eastern Metropolitan Region. Examples include waste management and recycling, environmental strategies, community services and education, greenhouse strategies, community development, landuse and transport planning.

In addition, many actions in the strategy also link with Federal Government initiatives, such as the National Greenhouse Strategy and the National Local Government Biodiversity Strategy. It is important to ensure that sufficient funding, resources and support are provided from both Federal and State Governments to enable Regional Councils and Local Government to effectively deliver these Federal and State initiatives.

The content of this submission focuses on the actions contained in the strategy, particularly those with major implications for Regional Councils and member Councils. The comments are related directly to goals and priority areas identified in the strategy.

It is recognised that the principles, visions and goals identified in the strategy espouse to a better place for all Western Australians and are likely to be supported by most sectors of the community.

SUSTAINABILITY AND GOVERNANCE

Sustainability Assessment

New structures and improved processes to incorporate sustainability assessments at the State Government level (Actions 1.1 and 1.2) are supported and will assist in providing a framework for Regional Councils and Local Government to fit into.

Institutional Change

The additional tasks proposed to be undertaken by the Sustainability Policy Unit to implement the State Sustainability Strategy (Actions 1.3 and 1.4) aim to achieve a

whole of government approach to sustainability and will more clearly define the role of Local Government in this process.

Embracing Sustainability in Government Agencies

The incorporation of sustainability principles in legislation up for review or drafting (Action 1.5) and the development of a Sustainability Code of Practice (Actions 1.6 and 1.7) will assist State Agencies and Local Governments in determining how to "operationalise" sustainability. To facilitate this process, the State Government proposes to develop a Sustainability Resource Guide to assist in the preparation of Sustainability Action Plans.

Partnerships for Action

The proposed establishment of a partnership with Local Government (through the Western Australian Local Government Association (WALGA) is aimed at creating a State-Local Government Common Sustainability Framework consisting of common principles, goals, approaches and programs for sustainability (Action 1.8). Further support to the already established State-Local Government Sustainability Roundtable (Action 1.9) will explore the role of Regional Councils in supporting sustainability and the implementation of sustainability at the Local Government. Officers of the EMRC have been involved in the roundtable and propose to play a leadership role in future roundtable forums.

Working with other stakeholders to achieve sustainability outcomes (Action 1.10), particularly to improve Local Governments involvement in large development projects (Action 1.11), are supported and will require further negotiation with Local Governments to determine suitable arrangements and resource requirements.

Planning for Sustainability

Working with Local Government, industry and community (through the State-Local Government Sustainable Roundtable), it is proposed to investigate the application of statutory planning processes to support sustainability outcomes (Action 1.12) and to facilitate increased involvement of Local Government in natural resource management (Action 1.13). Statements of Planning Policy (SPPs) have been identified as a method to give legal effect to sustainable planning controls and to guide actions for State Government and Local Governments. As an active member of the roundtable, officers of the EMRC will provide input into planning and natural resource management proposals to ensure that they are practical and effective at the Local Government level.

The formation of a Strategic Alliance with the Department of Planning and Infrastructure (Action 1.14) and conducting a Planning for Sustainability Forum (Action 1.15) are key State Government actions identified to assist in reforming the planning process to incorporate sustainability.

Sustainability in the Regions

Of the 249 actions contained in the State Sustainability Strategy, the proposed development of Regional Sustainability Strategies (Action 1.16) has the most significant resource and cost implications for the EMRC. The Regional Sustainability Strategy would need to include social, environmental and economic factors relevant to the region. If supported and developed, it is likely that an EMRC Regional Sustainability Strategy would be a joint project between Regional Development, Environmental Services and Waste Management/Engineering Services. The Regional Sustainability Strategy would consolidate the Regional Environmental Strategy, Regional Marketing Strategy, Resource Recovery Project, Regional Youth Strategy, Regional Tourism Strategy and other projects and activities related to sustainability.

Indigenous Communities and Sustainability

The development of Indigenous Regional Sustainability Strategies (Action 1.19) would form a key social and cultural component of the Regional Sustainability Strategy. Assisting Indigenous communities in the establishment of cultural interpretive centres (Action 1.21), expanding Indigenous Cross-Cultural Awareness Training (Action 1.22) and working with communities to target employment and housing opportunities (Actions 1.23 and 1.24) are key actions that would improve the reconciliation process with Indigenous communities and Local Governments.

Research and Development for Sustainability

The proposed establishment of a Global Centre for Sustainability in Western Australia (Action 1.25) and various other research initiatives (Actions 1.26, 1.27 and 1.28) will benefit Local Government and their communities and seek to establish Western Australia as leaders in sustainability.

Sustainability Information Online

The establishment of a Sustainability Online service (Action 1.29) will assist Local Government, community, schools and universities to access relevant information about sustainability from a central place.

Recognising Sustainability Excellence

The creation of an Annual Sustainability Award to recognise significant achievement in sustainability (Action 1.30) is supported as an initiative to promote best practice in this area.

CONTRIBUTING TO GLOBAL SUSTAINABILITY

Population, Development Aid and Environmental Technology

It is recognized that Western Australia is well placed to provide a leadership role in regards to global sustainability.

The strategy assumes that Australia, as a developed country, is more advanced in many areas of sustainability, however, it should be recognized that developing countries have a lot to offer in this area, particularly "doing more with less".

The commitment to conduct a study on the relationship between population and consumption in Western Australia (Action 2.5) is supported, however the strategy should focus on sustainability consumption issues. For example, Western Australia has one of the highest consumption rates and energy use rates per capita in the world. This indicates that consumption may be more related to lifestyle and consumption behaviour, rather than population. Based on this assumption, there is a need for improved communication and education of the community in regards to reduction in consumption rates.

Maintaining our Biodiversity

Local Government is particularly well placed and has the capacity to influence land use activities to achieve conservation and maintenance of biological diversity. Local Government can impose conditions on development and subdivisions relating to vegetation protection and the retention of bushland linkages through their Town Planning Schemes.

For more effective decision-making on biodiversity, Local Government will need to gain a better understanding of conservation values for local biodiversity occurring in their areas. This is one of the key aims of the Perth Biodiversity Project, which is a partnership project between WALGA and Councils in the metropolitan area. At the regional level, the EMRC has been very active in assisting member Councils to protect and manage their local biodiversity.

The National Local Government Biodiversity Strategy (NLGBS) has been developed to assist Local Government be a key partner in biodiversity conservation. The NLGBS supports regional partnerships and planning for biodiversity conservation. This view should be supported by the State Government and lead to additional resources and funding available to Local Government to undertake biodiversity conservation activities.

Local Government should be a major stakeholder associated with the proposed Biodiversity Conservation Act and Biodiversity Conservation Strategy (Action 2.7).

The EMRC supports the State's intent to facilitate nature based recreation and tourism and Western Australia's sense of place (Action 2.9). The EMRC has successfully undertaken this at a regional level and has developed a Regional Tourism Strategy and an eco-tourism guide for the eastern region of Perth.

Our region is well placed to site the proposed Biosphere West Project (Action 2.11) given its natural attributes (Swan River, Darling Scarp and the Hills) and the significant extent of declared rare flora, rare fauna, threatened ecological communities and priority listed flora in the eastern metropolitan region.

Local Government and local communities have a lot of information and knowledge to contribute toward the completion of a biological survey for Western Australia (Action 2.13).

Responding to Greenhouse and Climate Change

The State Sustainability Strategy needs to clearly identify the relationship with the National and State Greenhouse Strategies. The strategy also needs to clearly set a target for greenhouse gas emission reduction and undertake dedicated action to achieving this target.

The State should also take a lead role in engaging non-government organizations such as industry and community in its effort to reduce greenhouse gas emissions and not solely focus on government activities.

The strategy should also consider other impacts from increasing greenhouse gas emissions. Climate change is only one and other equally important issues such as greenhouse gas and its interaction with other natural resource issues (ie. extinction of species) needs to be carefully considered.

There is considerable scope for reducing greenhouse emissions from the government vehicle fleet and already existing knowledge of how this can be done such as simple changes of using smaller more fuel-efficient vehicles. No further 'investigations' are considered necessary (Action 2.18) and it is considered more appropriate to constructively work towards positive and committed actions that lead to change.

'Maintaining the commitment' to ensuring that greenhouse is a significant factor in power decisions (Action 2.19) is not considered appropriate as the current level of decision making to support sustainable energy are inadequate. While it is recognized that there is a shift toward sustainable power sources, the rate of change is inadequate and a more positive and direct action is required to progress sustainable power and renewable energy. Expansion of existing coal power stations is not 'maintaining a commitment' to this view. It is recommended that a task force be set up to identify ways to improve the "take up' of sustainable and renewable energy initiatives and opportunities to achieve greater efficiencies with existing infrastructure. This task force should involve Local Government, particularly those involved in the Cities for Climate Protection (CCP) program who require more support from government corporations such as Western Power.

The provision of mechanisms in the electricity market for encouraging renewable energy and distributed generation (Action 2.20) is supported and should be considered further in the taskforce mentioned above.

Oil Vulnerability, the Gas Transition and the Hydrogen Economy

The use of oil is not sustainable and other broader fuel types (ie. renewables, local sources, efficiency, affordability) in addition to hydrogen should be adequately considered.

There is also a definite need to increase public transport infrastructure and this should be coupled with an extensive consultation, public education and marketing program.

The proposed establishment of a taskforce (Action 2.24) is supported, however, there must be diverse and independent representation.

SUSTAINABLE USE OF NATURAL RESOURCES

Sustainable Agriculture

The proposal to establish Regional Councils as part of the partnership agreement to promote sustainable agriculture and other natural resource management activities (Action 3.3) is strongly supported. The EMRC provides a successful model of a partnership with the member Councils to enable a strategic long-term focus to address regional issues such as landcare, catchment management, biodiversity conservation, revegetation programs and wildlife corridors.

Improving the coordination of fox and feral animal control programs through Local Government and farmers' involvement (Action 3.6) is supported, but will require funding and resources given that this activity is not part of core business for Local Government.

Sustainable Fisheries and Aquaculture

The majority of actions contained under this goal (Actions 3.10 to 3.16) are supported, but are the responsibility of the State Government and have limited implications for the EMRC and member Councils.

Sustainable Forestry and Plantations

Encouraging timber industry reforms (Action 3.17) and encouraging the transition toward plantation timber (Actions 3.18, 3.19, 3.24 and 3.25) are supported and will minimise the impact of harvesting native forests for timber production.

There is limited knowledge, understanding and assistance regarding dieback management in Western Australia and the proposal to prepare a comprehensive Dieback Strategy (Action 3.23) is strongly supported. The 'Dieback Working Group', established to protect bushland from dieback and develop and implement Codes of Practice, provides information and guidelines to Local Government and the community. It is recommended that the Dieback Working Group be involved in the development of a comprehensive Dieback Strategy.

Sustainable Mining and Petroleum Production

Although supported by the general community, the range of actions associated with this goal (Actions 3.26 to 3.31) are mostly relevant to the State Government and industry, who are best placed to provide comments of the actions proposed.

Sustainable Tourism

The EMRC supports the State's intent to facilitate nature based recreation and tourism and Western Australia's sense of place (Action 3.32). The EMRC has successfully undertaken this at a regional level and has developed a Regional Tourism Strategy and an eco-tourism guide for the eastern region of Perth.

Local Government is also likely to be a key stakeholder in further developing cultural tourism (Action 3.33), particular in this region which has a rich culture and significant natural resources.

The application of an appropriate accreditation to a Local Government area as a way of demonstrating area-wide sustainability (Action 3.35) is currently being investigated by EMRC based on the Green Globe model.

Protecting Aquatic Systems

The EMRC generally supports the actions to protect aquatic systems, however, consideration of water quantity objectives and catchment management issues need to included in Action 3.38.

Ensuring that activities in the catchments are actively managed through management, community partnerships and legislation (Action 3.40) is a particular action that the EMRC and the member Councils have an active interest. The EMRC coordinates the Eastern Hills Catchment Management Project (EHCMP), which received the 2001 Premiers Award for Excellence in Public Sector Management (Sustainable Environment category). In developing and implementing this project over a five (5) year period, the EMRC has a thorough understanding of issues associated with catchment management in an urban context and can assist the State Government in identifying measures to improve existing arrangements related to Natural Resource Management and the Natural Heritage Trust.

Sustainable Coastal and Marine Environments

Although supported by the general community, the range of actions associated with this goal (Actions 3.45 to 3.50) are mostly relevant to the State Government, who are best placed to provide comments of the actions proposed in consultation with key user groups, industry and the community.

Sustainable Rangelands Management

The actions associated with this goal (Actions 3.51 to 3.56) are mostly relevant to the State Government, who can provide comments of the actions proposed in consultation with key stakeholders and pastoralists in the areas identified.

SUSTAINABILITY AND SETTLEMENTS

Managing Urban and Regional Growth

Facilitating projects in country towns to capture "sense of place" (Action 4.1) and encouraging sustainable employment opportunities in outer metropolitan areas (Action 4.2) are generally supported and may also be relevant to areas in the Eastern Metropolitan Region such as the peri-urban Councils of Swan, Mundaring and Kalamunda.

Urban growth is an important issue for Western Australia, particularly the Perth metropolitan area, and there needs to be a coordinated and consistent approach across State and Local Government planning objectives and processes (Actions 4.3 and 4.4).

The progressive implementation of Bush Forever (Action 4.5) is strongly supported by Local Government, particularly as there is a perception that limited activity has occurred and there has been almost no communication of progress since the adoption of the report by the State Government. Significantly more funding is required to be provided by the State Government to implement this important initiative, particularly for Local Governments who are managing Bush Forever sites.

Protecting designated groundwater mounds from incompatible developments and the use of water sensitive urban design to rehabilitate urban wetlands (Action 4.6) is supported. Western Australia pioneered water sensitive urban design, however lack of its application by Government agencies, developers and Local Governments has resulted in other Australian states progressing well ahead of this state in terms of implementation. Greater research and level of commitment from the State Government is required to ensure that water sensitive urban design principles are incorporated into future rehabilitation of urban wetlands, urban development, planning and urban renewal projects.

Revitalising Declining Centres and Suburbs

Proposed actions to 'revive' the suburbs and consult with Local Government (Actions 4.7, 4.8, 4.9, 4.9 and 4.10) are all strongly supported. This is an important issue for many areas in the Eastern Metropolitan Region, which would benefit through urban renewal projects. State Government intervention and investment into Local Government through ongoing revitalisation programs (Action 4.10), is also highly commended. This also has important social, economic and environmental implications for Local Government and its communities and provides a good opportunity to raise awareness of sustainability principles within the business and community sectors.

Integrating Land Use and Balanced Transport

The move towards adopting the framework used in 'Liveable Neighbourhoods' (Action 4.13) is supported. This action needs to have a greater level of commitment and a statutory basis to ensure the active adoption of Liveable Neighbourhood principles in all future development projects.

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Improving pedestrian access (Action 4.14) and bicycle use (Action 4.15) and enhancing rail transport and feeder systems (Action 4.16) and other research tasks (Actions 4.17 and 4.18) are supported as initiatives to reduce car dependency.

Developing programs to increase mixed-use development (Action 4.19) will assist in taking advantage of existing transport infrastructure and encourage liveable neighbourhoods.

Flexibility in residential zoning to allow for small business in residential areas (Action 4.20) is supported and is an important issue for Local Government in addressing sustainability in the business sector. Careful consideration however, needs to be given to the administration and implementation of this issue to ensure compatibility with neighbouring residents.

The review of the Metropolitan Transport Strategy to double the rail system and facilitate other upgrades (Action 4.22) is supported by the EMRC and should be targeted toward the Eastern Metropolitan Region that is lacking in these facilities, compared to other regions.

Managing Freight And Regional Transport

The range of action to increase the utlisation utilisation of the freight network (Actions 4.27 to 4.30) are supported, but will require consultation with Local Government to ensure that local factors are taken into account. The in corporation of sustainability techniques in contentious road and rail planning (Action 4.31) is supported and should achieve more balanced outcomes. The proposed creation of Regional Transport Plans (Action 4.33) with Regional Councils is supported, particularly as the EMRC is currently investigating major infrastructure projects requiring implementation in the region.

Preserving Air Quality

The Perth Air Quality Management Plan (AQMP) requires Local Government to support lead agencies in the implementation of a number of actions identified in the plan (Action 4.34). The extent and level of Local Government support in implementing the AQMP recommendations is not clear, although it is recognised that some of the support actions (community education, greenwaste collection and transport planning) are already being undertaken by member Councils of the EMRC. Many actions associated with this action could be administered through Local Government such as proposed changes to the Building Codes of Australia.

The development of a Statement of Planning Policy for Integrated Land Use Planning and Transport (Action 4.35) is supported and will provide much needed guidance and consistency in Local Government's approach in this area. Local Government is a key player in the delivery of this action and the proposed State-Local Government Partnership to progress this is supported (Action 4.35).

The continued provision of community information and education to change behaviour with regard to the burning of domestic wood fires and non-car modes of transport (Action 4.36) is supported. This action links with many activities Local Government's are undertaking through the Cities for Climate Protection Program and opportunities to form partnerships should be investigated to assist in the delivery of this information.

The EMRC and member Councils, through involvement with the Cities for Climate Protection Program, have identified linkages and conflicts between air quality issues and Greenhouse issues (Action 4.37) relevant to the Eastern Metropolitan Region. This action is supported as an important issue to address air quality issues in the community.

The monitoring of air quality (Action 4.38), development of air quality guidelines and standards (Action 4.39) and undertaking of cost benefit analysis of air quality decision making (Action 4.40) is supported and is most relevant to State Government.

Reducing And Managing Waste

Working towards a zero waste society (Action 4.41) and recognition of Regional Councils showing how this can be achieved is commended, particularly given the achievements the EMRC and its member Councils have attained in this regard.

Engagement in sustainable waste management by Local Government and the Waste Management Board through the State-Local Government Sustainability Roundtable is supported (Action 4.42). The EMRC have been involved in the roundtable and propose to play a leadership role in future roundtable forums.

The introduction and enactment of the Waste Management and Contaminated Sites Bills (Action 4.43) has important implications for Local Governments and industry. The legislation, once enacted, should have positive outcomes in terms of the identification and clean up of contaminated sites in the region.

The EMRC is represented on the Waste Management Board and will provide input through this forum into the development of a detailed plan for each waste stream to outline how Western Australia will achieve the goal of zero waste (Action 4.44) and the administration of the waste levy to reflect environmental and social costs of waste disposal (Action 4.47).

The EMRC is committed to recycling at an organisational level and actively recycles a range of products (Action 4.45) from paper to organic material used for an office worm farm. Support is given for the encouragement of other Government agencies to act as leaders to their community, particularly State Government agencies.

The proposed action to require all Regional Organisations of Councils or Local Governments to prepare Waste Management Plans is generally supported and will ensure that waste management activities are identified and planned. The EMRC has undertaken significant research and prepares development plans for the Red Hill Waste Disposal Facility to guide future activities. The scope of information and content proposed for the Waste Management Plans will need to be discussed and negotiated with Regional Councils and Local Government.

Examining how the Waste Management Board's waste levy can better reflect environmental and social costs of waste disposal (Action 4.47) is supported. The setting of mandatory waste targets for hazardous wastes (Action 4.49) and undertaking a comprehensive review of hazardous waste reduction in Western Australia (Action 4.50) are important short term actions to resolve the current crisis in hazardous waste management.

Requiring the Resource Recovery Precinct Team to nominate and establish 5 resource recovery precincts for the metropolitan region (Action 4.51) will need to be undertaken in consultation with Local Governments, as well as community organisations and the Waste Management Board.

Our Water Future

The proposed actions to complete the State Water Conservation Strategy (Action 4.52) and establish a 10% reduction per capita in water use (Action 4.53) is commended. It is important to ensure that industry is identified as a major user of potable water and there are many opportunities to reduce water consumption in this area

The establishment of guidelines for household use of grey water (Action 4.54) is an area that needs considerable action from the State Government (Health Department), particularly given our current water crisis. Considerable information is available and already being implemented in other parts of Australia and the world in this area. The State Government needs to gain the commitment of relevant agencies to ensure that Western Australia adopt similar practices and utilises grey water at the household level in a safe and practical manner.

The development of partnerships with Local Government to ensure water sensitive urban design (WSUD) is built into all urban development (Action 4.55) is not considered adequate. A planning policy and regulatory framework for WSUD by the State Government (through the Western Australian Planning Commission) is required to ensure that this is incorporated into zoning proposals and subdivision applications. The Department of Environment, Water and Catchment Protection should also be a key agency in promoting the adoption of WSUD, particularly in regards to research, institutional reforms and structural frameworks to improve stormwater management in Western Australia.

The proposal to ensure that Regional Councils take more responsibility for managing groundwater, including bores, through the development of Regional Groundwater Management Plans (Action 4.56) is not supported, as this cannot be practically implemented at a regional level. All commercial scale irrigation bores established by Local Government are licensed through the Department of Environment, Water and Catchment Protection. The management of groundwater is a State Government responsibility and therefore this action requires review.

The construction of the Kwinana waste water reuse facility and individualized marketing of water conservation and supply options (Action 4.57 & 4.58) are supported in principle.

Sustainable Energy

The development of voluntary schemes with the housing industry to demonstrate at least 4 star energy rating on new homes (Action 4.59) is supported and will need to be developed in consultation with Local Government, who will be responsible for ensuring compliance with this initiative. A rating scheme for renovations (Action 4.60) should be developed in conjunction with a similar rating scheme for new homes (Action 4.59). The changes to the Building Code of Australia provide an opportunity for the State Government to work with Local Governments to incorporate rating systems into the building approvals process. Financial or other support/incentives for the application of energy rating schemes for buildings needs to be clearly identified.

The proposal to maximise solar orientation of new developments (Action 4.61) is supported and should be considered in investigations to apply statutory framework for the adoption of Liveable Neighbourhood principles (through the Cities for Climate Protection Program.

Encouragement of building design and management for energy efficiency for all government buildings (Action 4.62) is supported and is being progressed by the EMRC and member Councils through the Cities for Climate Protection Program. This is an important initiative and should be progressed by State and Local Governments as a priority for future development.

Eco-Loans (Action 4.63) will provide a practical incentive to low income earners to make the necessary changes to their housing design to achieve long term cost savings and reductions in energy consumption. This action could be coupled with the awareness and information campaigns being conducted by Local Government.

The development of Sustainability Action Plans as a demonstration of government leadership (Action 4.64) is supported and will provide guidance on a consistent approach for government agencies. Local Governments are addressing this through corporate action plans as part of the Cities for Climate Protection program.

Information gained through fuel trials (Action 4.65) should be made available to Local Government as they are also investigating alternatives for fleet vehicles.

Proposed actions related to power generation (Action 4.66, 4.67, 4.68, 4.69 & 4.70) should demonstrate a genuine commitment toward increased provision of energy from sustainable sources is achieved. This commitment is necessary to discourage the use of non-renewable energy sources in future power provision.

Implementation of energy minimisation at the household level and in government procurement activities (Action 4.71) should include liaison with Local Governments undertaking the Cities for Climate Protection Program as a number of similar projects have been implemented by WA Councils, particularly household energy conservation information programs.

Preserving Cultural, Heritage, Landscapes And Creating 'Sense Of Place'

Support for the development of Regional Sustainability Strategies (Action 4.72), as previously noted, has significant resource and cost implications for the EMRC. It is likely that Regional Councils and Local Governments would need to engage specialist expertise in areas related to culture and heritage.

Encouraging Local Government's implementation of heritage to be consistent, transparent and builds on existing plans and character, whilst allowing for sympathetic infill (Action 4.73) is supported. At present, there are varying levels of protection, confusion on responsibilities and criteria for heritage buildings and there is a need for a consistent and commonly agreed framework.

Initiatives to provide learning opportunities (Action 4.74), support Indigenous communities (Action 4.75) and the development of a Built Environment Policy (Action 4.76) and Creative city Policy (Action 4.77) are generally supported.

Building Sustainably

Promotion of a voluntary 4 star energy rating on all new homes (Action 4.78) is supported, however, it is recommended that the 4 star energy rating system is not promoted as a voluntary exercise. A stronger level of commitment and approach should be adopted as has occurred in a number of other eastern states, where a minimum star rating is required before a house can be sold.

The development and implementation of a Sustainable Planning, Building and Construction Guide through the State-Local Government Sustainability Roundtable (Action 4.79) and relevant State Government documents (Action 4.80) is strongly supported and some progress in this area is already occurring through the Building Codes of Australia and the Housing Industry Association.

The development of incentives for sustainable building and construction including renovation (Action 4.80) is supported and is a key issue for Local Government through the planning and development application process. This issue should involve consultation with Local Government to identify the most practical ways to implement and administer this initiative.

SUSTAINABILITY AND COMMUNITY

Community Services and Development

The proposed development of a Policy on Regional Integrated Community Services based in Regional Councils (Action 5.1) is an action that will have direct relevance to the EMRC and member Councils. The involvement of the community (Action 5.2), utilising the Consulting Citizens Resource Guide (Action 5.3) reviewing crime prevention programs (Action 5.4) and capacity building at the community level to support carers and volunteers (Action 5.5) are key initiatives that would link to a Regional Integrated Community Services program. The EMRC is in a position to

undertake an advocacy and facilitation role for these proposed activities, which would benefit the delivery of member Councils services in this area.

Housing and Sustainability

The proposed development of a Statement of Planning Policy on Public Housing, community Housing and Affordable Private Housing (Action 5.6) is supported, but will require Local Government input to ensure that policy objectives prepared by the Western Australian Planning Commission (WAPC) are practical and achievable. An evaluation of under-utilised government owned land close to services (Action 5.7), the development of a community housing framework involving standards and accreditation (Action 5.8) and various research and training activities to increase sustainable housing design and construction (Actions 5.9 and 5.10) are commended, but would need to involve Local Government in their development.

Sustaining Healthy Communities

Many of the actions under this theme are specific to the State Government. Support the existing role of the health sector and health programs that deal with long term health issues (Action 5.11) and continuing health programs that recognise cultural and remote communities is the responsibility of the Health Department of Western Australia. Ensuring that health is a part of the Regional Integrated Community Service Plans (Action 5.12) and providing links between the health sector and other agencies (Action 5.14) will need to be considered by Regional Councils and Local Governments should this initiative be supported.

Developing health impact assessments as part of a sustainability assessment process (Action 5.15) and pursuing the recommendations of the Report of the Health Administration Review (Action 5.16) are the responsibility of the State Government. Initiating a program to enhance the delivery of services to 0-8 year olds and their families (Action 5.17) requires the involvement of key government agencies (including Local Government) and local communities.

Education and Community Awareness for Sustainability

The delivery of education and community awareness programs on sustainability is a key issue for Local Government.

The EMRC and member Councils, through its involvement in a range of waste management, environmental and regional development initiatives, are keen to work with the State Government and other key stakeholders to address education (Action 5.27) and transport (Actions 5.28 and 5.29) issues. A regional approach allows for better integration of transport networks and the effective delivery of community education programs. The EMRC, in consultation with the member Councils, is in the process of identifying high priority infrastructure projects (mainly transport related) in preparation for a presentation to the State Government seeking support to progress these initiatives in our region.

Sustainability Through Culture and the Arts

The State Government has a key role to play in progressing the actions related to culture and the arts (Actions 5.30 to 5.37). The proposed action related to supporting cultural tourism (Action 5.34) is commended by the EMRC, particularly as the region has a strong culture and arts history. The successful implementation of this action will provide much need State Government support for the member Councils and assist in the recognition and protection of heritage, Aboriginal culture and areas of significance in the eastern metropolitan region.

SUSTAINABILITY AND BUSINESS

Training and Facilitation for Sustainability

The majority of actions for training in sustainability (Actions 6.1 - 6.4) relate to the State Government and will require commitment and resources.

Working towards establishing a Centre for Applied Sustainability in TAFE (Action 6.1) is an action that may have benefits to the region, particularly as Midland TAFE already has courses in environmental management and has been hosting seminars on sustainability and other related topics. Providing leadership on certification and accreditation for professional activities in sustainability (Action 6.5) would be relevant to the EMRC and member Councils, given that there are a number of staff in the region working on sustainability projects that would benefit through greater formal recognition of this discipline.

Financial Reform and Economic Instruments for Sustainability

Financial reforms and economic instruments being considered include encouraging sustainable investments (Action 6.6), examining subsidies that have positive sustainability outcomes (Action 6.7), policy changes (Action 6.8) and working towards triple bottom line reporting (Action 6.9). These actions will assist in providing financial and economic incentives that are capable of filtering through to local business and communities.

Eco-efficiency and Industrial Ecology

Encouraging the adoption of the Western Australian Sustainable Industry's Group Cleaner Production Statement (Action 6.10) is supported. The EMRC has signed a Cleaner Production Statement and is in the process of implementing a Cleaner Production action plan.

Extending eco-efficiency to other industrial precincts (Action 6.11) and exploring the development of an Eco-Industries section within the Department of Environment, Water and Catchment Protection (Action 6.12). The expansion of the Industrial Waste Exchange program (Action 6.13) and the encouragement of sustainable business clusters around resource recovery precincts and industrial parks (Action 6.14) are considered positive waste management initiatives. The inclusion of sustainable business technologies and solutions on the Sustainability Online website

(Action 6.15) and active participation in national eco-labelling programs (Action 6.16) will provide direction in the small business sector on sustainability.

Industry Sustainability Covenants

The development of sustainability covenants is aimed at encouraging industries, associations and governments to enter into non-binding agreements to demonstrate sustainability outcomes (Action 6.17).

The views expressed in this submission aim to be representative of the EMRC and its member Councils and seek to provide guidance on the development of the State Sustainability Strategy, particularly with regards to issues facing Local Government.

CONCLUSION

In conclusion, the EMRC is generally supportive of the State Sustainability Strategy, however Regional Councils and Local Government participation in the finalisation and implementation is critical to the success of the strategy. Issues such as priorities, resources, funding, responsibilities, timeframes and ongoing consultation and review will need to be resolved in the finalisation of the strategy.

The EMRC intends to be involved in the State-Local Government Sustainability Roundtable to work though the strategy and the issues raised above to ensure that the implementation of the strategy is practical and achievable.