

Our Ref: CXR:111202
Contact: Caroline Raphael - 9432 9914

27 February 2003

Professor Peter Newman
Director, Sustainability Policy Unit
Department of the Premier and Cabinet
197 St Georges Terrace
PERTH WA 6000

Dear Peter

**THE WESTERN AUSTRALIAN STATE SUSTAINABILITY STRATEGY -
CONSULTATION DRAFT**

The City of Fremantle welcomes the opportunity to comment on such an important strategy which will guide the State of Western Australian towards a sustainable future.

The City of Fremantle has accepted its role in progressing sustainability at the local level and is formally committed to developing a sustainability plan with principles, visions and goals that allow the City to progress towards a sustainable future.

Councillors have been supplied a copy of the draft strategy and officers from the City of Fremantle have been involved in the review of the draft strategy. Officers have attended the public workshops held by the Department of the Premier and Cabinet and have developed a series of comments and suggestions for the draft strategy. These comments and suggestions are attached to this letter and the City of Fremantle requests consideration of this submission.

If there are any queries, please do not hesitate Caroline Raphael on 9432 9914.

Yours sincerely

RAY GLICKMAN
Chief Executive Officer

ISSUES AND COMMENTS WITH REGARD TO THE WESTERN AUSTRALIAN STATE SUSTAINABILITY STRATEGY – CONSULTATION DRAFT

Overall

The City of Fremantle views the Draft State Sustainability Strategy as an important step in creating a better future for our environment and society. It makes the State Government and key stakeholders more responsible in ensuring that actions taken in the future will benefit all in a fair and equitable manner across all sectors and generations.

However, as a general comment, the lack of information on responsible persons/organisations and timelines for achievement for the proposed actions and indicators diminishes the importance of progressing such actions in a timely manner to achieve significant outcomes. In addition, the draft strategy has been written largely as a State Government initiative to progress sustainability through its activities rather than as a comprehensive State-wide Strategy for all sectors of the community to contribute and progress sustainability. As such, the objectives and proposed actions throughout the strategy need to reflect the requirements that other sectors in the community need to progress or initiate for the achievement of sustainability.

The following comments and issues have been raised following review of the document and attendance of public workshops and the City of Fremantle anticipates that the Department of the Premier and Cabinet will take into account these comments and issues in the review of the draft strategy.

The conceptual basis: developing a framework for sustainability

The City of Fremantle acknowledges and agrees that the state of our environment is a direct result of and is affected by our activities and the need to apply sustainability for all of our actions is needed to reduce and limit our impact on the environment, now and into the future.

The definition of sustainability effectively allows for this to occur and as such, the City is supportive of its application especially as it addresses the simultaneous improvement within all sectors (environment, social and economic) without the need for tradeoffs.

The suggested sustainability framework, principles, visions, goals and priority areas are comprehensive and inclusive and thoroughly address all areas of concern with regard to sustainability. As such, the City of Fremantle is supportive of the framework, principles, visions, goals and priority areas for application within Western Australia. The City of Fremantle will have its own set of sustainability principles, visions and goals for its community following consultation, however, consistency will be an important factor to ensure that both the State Government and the City of Fremantle are progressing in the same direction. The identified State-Local Government Common Sustainability Framework which will be set in a partnership agreement, will certainly assist in this, but it must be supported with resources for a period of time as many councils do not have the staff to apply and progress sustainability.

Sustainability and Governance

This section addresses an issue which the City of Fremantle is keen to progress: sustainability assessment. While it is acknowledged that local government has a critical role in planning and decision-making for sustainability, the actions proposed do not adequately allow or support local governments to undertake sustainability assessments.

The State-Local Government Sustainability Roundtable is mentioned a number of times throughout the draft strategy and this mechanism is suggested to develop a common sustainability framework between State and Local governments. However, this type of arrangement has the potential to fail unless durable and resilient processes are established to ensure the success of this Roundtable process, irrespective of political party leadership in government. Funding and resourcing should also be made available for the Roundtable process. Clearly defined and agreed terms of reference should also be established and approved by Cabinet.

With regard to a sustainability assessment process, it would be preferable for one agreed process to be applied across both levels of government to ensure consistency. Proposed action 1.2 should be changed to “Establish an Industry-Government Working Group on Sustainability Assessment to develop an agreed process for application across State and Local Government decision making processes”. An additional proposed action 1.3 should be, “Government to facilitate the implementation of the agreed sustainability assessment process across State and Local Government with adequate resourcing”.

Institutional change is also important within and across local governments and additional actions will be required in this area if sustainability is to be successfully applied. State Government should lead this process throughout both state and local governments and the objectives and proposed actions in this section should reflect this. This equally applies to the section titled “Embracing Sustainability in Government Agencies” where acknowledgement of the efforts by local government is not present. The State government again should lead and support programs, with resourcing, that allow local governments to embrace sustainability. The Sustainability Code of Practice appears to hold a great deal of hope is doing this and local government should be involved in this process and be able to apply the Code of Practice in their own operations if they choose to.

Partnerships are important and vital in some instances in the application of sustainability. However, the proposed actions to progress partnerships amongst local government refers to the Western Australian Local Government Association (WALGA) with no mention of the Department of Local Government and Regional Development. This State Government department should take a greater role in leading local governments towards sustainability with the support of WALGA. The main output of this Roundtable process is proposed to be a State-Local Government Partnership Agreement, yet some form of resourcing will be required to implement the agreement and such funding processes should be designed to allow for long-term implementation of actions. In addition, the State-Local Government Partnership Agreement appears to cover the entire spectrum of

sustainability and it will need to be designed in a way as to ensure a consistent structure over time, that is resilient to other forces such as a change in government, and is supported by a central group of staff located in a government institution to ensure it is progressed and implemented successfully.

Research for sustainability is particularly important if we are to understand and improve our performance. The City of Fremantle would like to see research focussed on local communities and individual behaviour within the different sectors and environments in order to make the research outcomes more practical and relevant.

Accessible and relevant information is important and the proposed action to develop “Sustainability Information Online” which will host a range of information, is supported by the City of Fremantle.

Contributing to global sustainability

Greenhouse gas emissions and the enhanced climate change effect is the most important environmental issue facing the entire planet and south-west Western Australia is predicted to be worst hit.

To date, Local Government has taken one of the lead roles in reducing greenhouse gas emissions from their own operations and within their communities and there is now an expectation that others will also do the same. Proposed action 2.15 should be changed to “Establish a mandatory program of greenhouse offsets to assist large development projects to reduce greenhouse gas emissions by investing in energy efficiency, renewable energy, carbon sequestration or other accredited projects in Western Australia”.

Proposed action 2.18 should be changed to “Investigate and implement systems and programs to reduce greenhouse gas emissions for different vehicle fleets and electric train systems”.

Proposed action 2.21 should also include a provision to identify funding requirements and responsibilities for adaptation measures, now and into the future.

Sustainable use of natural resources

The sustainable use of natural resources is considered critical if we are to seriously tackle the level and impact of our consumption and production behaviour. The City of Fremantle is supportive of the proposed actions outlined in this section, however, the City’s ability to apply some of these actions will be limited by resources. Certain proposed actions will be progressed through the State-Local Government Partnership Agreement and it is important for the State Government to recognise at this early stage, that like many other Local Governments, financial and staff resources are limited to apply such actions.

The proposed actions for protecting aquatic systems are still unspecific in terms of actual actions. For example, proposed action 3.36 states “protect water dependent ecosystems while allowing for the management of water resources for

their sustainable use and development to meet the needs of current and futures users” but does not state how this will be achieved nor who will be responsible to do this. The same applies for proposed actions 3.37, 3.38, 3.39, 3.40, 3.43 and 3.44 and all need to be reworded to state exactly how such actions will be achieved.

The proposed action under “Sustainable Coastal and Marine Environments” to develop a State Coastal Strategy and a State Marine Planning Strategy is supported by the City of Fremantle to ensure the protection of our coastal and marine environment.

Sustainability and settlements

General

It appears that a confusing number and hierarchy of strategies and policies is emerging from government and the relationship between them all should be clarified and where possible, combined. For example, the relationships between the State Planning Strategy, Future Perth and Sustainability Strategy, state planning policies, R Codes etc. should be clearly clarified and defined.

Managing Urban and Regional Growth

The City of Fremantle supports the use of the Metropolitan Development Program to guide growth and that it be used as a decision making tool rather than documenting current and anticipated development. In addition, the role of the development industry is not incorporated. Strategy 4.4 should include the involvement of land developers about the timing of land release more so than local government. This raises the question of “who is leading and who is following ?” with regard to land development.

The City of Fremantle has identified that there is a need for more resources to monitor the success or otherwise of documents and policies such as the Liveable Neighbourhoods Codes. In particular, the status of the Liveable Neighbourhoods Codes needs to be clarified to assist in its use.

The role of the state government in ‘coordinating and developing’ local planning strategies remains unclear. It seems that local government prepare local planning strategies and the state government approves them with no resources or assistance provided.

The employment strategy is viewed as weak and needs further work to make it useable and effective.

The target for managing urban and regional growth needs to be refined and expanded to encompass the breadth of this topic.

Revitalising Declining Centres

A definition of ‘declining’ centres and suburbs required and there is likely to be a difference in opinion between what urban professionals and residents/property

owners may see as decline. There is also a need to ensure community change is not necessarily seen as a decline as suburbs must accommodate change particularly in household structure.

It is expected that community involvement in determining 'declining' suburbs will be required. Issues and problems must be clearly identified and the bottom up involvement is considered equally important as any top down intervention.

Scope and role of 'Community Code for Revitalisation' must be clarified to ensure that there is no conflict with policies or plans already developed by middle suburbs. If developed, the Community Code for Revitalisation must encompass industrial and commercial areas.

Proposed action 4.11 will require careful community input. Previous efforts have not been successful as many communities remain opposed to higher density development. Protection of 'family capable housing' and 'amenities' such as backyards have been debated in Fremantle and it is still a contentious issue. In addition, further research into the energy efficiencies gained from higher density developments is required.

It would be preferred that a regional assessment and approach to residential density levels is undertaken rather than limiting it to a local government boundary.

Proposed action 4.12 should include "A network of case studies be compiled from across Perth (and elsewhere if 'culturally' relevant). Audits of completed programs or actions should be undertaken and compiled." Communities are now expecting action rather than the formulation of more strategies and reports which have a tendency to sit on shelves.

Integrating Land Use and Balanced Transport

There is still a need to resolve the outstanding regional transport issues in Fremantle. Substantial resources need to be applied for the proposed actions in this section and they should be prioritized. Many of the proposed actions need to be actioned at the local government level and it is expected that resources and assistance from the state government is offered.

There is also a required commitment across government to documents such as the Metropolitan Transport Strategy.

More ambitious targets need to be set for this section to ensure the proposed actions are actively and effectively pursued.

Managing Freight and Regional Transport

Demand management (page 143) is a key issue that should form the basis of transport planning in the Perth metropolitan area. However, the "predict and provide approach to transport planning is still alive and well in state government agencies. It's time to switch to the "predict and prevent" approach that is being applied in the UK. Reduced car use (page 134) is an element of demand management but funding cuts to the TravelSmart program and Transperth's budget are undermining the potential success of this approach.

The City of Fremantle requests that the draft strategy proposed actions reflect this and are changed to ensure consistency in approaches to reduce impacts from the transport sector.

The development of regional transport plans is a worthwhile initiative (proposed action 4.33) but there must be a partnership between state and local governments to ensure it is effective and is implemented.

Air Quality

Local governments have taken an active role in the protection of local air quality and at times are best suited to deliver localised programs for the community. For example, the Cities for Climate Protection Program has been an effective program to reduce greenhouse gas emissions within the community. Greater attention and resources through the implementation of the Perth Air Quality Management Plan should be afforded to local government to pursue effective programs aimed at improving local air quality.

An additional target for this section should be included which states a timeline by which Perth is the cleanest city for its size in the world. This target should also be consistent with best practice and be supported by government with resources to achieve it.

Preserving cultural heritage, landscapes and creating “sense of place”

There is a need to ensure appropriate assessment of what we need to ‘preserve’ whilst recognizing communities and cultures as dynamic. Sense of place is perhaps a useful phrase in this regard and needs to be defined in the draft strategy. Sense of place needs to be defined by formal standards and criteria and needs to refer to the character, historical associations, meanings, amenity, identity and sense of the community(s) and the community’s cohesion. Heritage has connotations of valuing the past however we need to put the same emphasis on what we are creating for the future. As such, the City of Fremantle expects the draft strategy to adopt the Burra Charter 1999 (the Australia ICOMOS Charter for Places of Cultural Significance) as a guide and set of standards applicable to heritage conservation.

Protection of built heritage is well established in many parts of the state, particularly Fremantle. However, further work is required on protection of the natural environment and vistas. This should be assisted in some way by the state government.

All government construction and building projects set aside a percentage of the project budget for public art. The City of Fremantle has been investigating ways to introduce a similar program for certain categories of private development. How a similar program can be implemented for local government should be fully investigated including aspects such as artworks on site, public area artworks and the decision making process for the acceptance of artwork.

Proposed action 4.76 appears to be too generic and resources may be better spent encouraging local government’s to develop their own specific built environment policies and scheme controls rather than generic Western Australian state level controls.

The cost of restoring and maintaining heritage buildings is often raised from building owners and through this strategy, the state government should examine and propose a series of subsidies, grants and tax incentives which aim to achieve the required protection, restoration and maintenance of such buildings.

The target for this section is again very limited in its scope. The indicators and targets could include dollars spent on and the number of festivals or artworks produced per year and should include some timeline for achievement.

Building Sustainably

Proposed action 4.8 raises the issues that numerous documents that guide planning and construction need to be combined and reduced to a one stop guide. The development of this one stop guide should also incorporate the housing industry views. The one stop guide should also include examples and case studies where possible and if needs be, develop and monitor trials and case studies in different climatic regions. This initiative is viewed as a critical step in achieving in sustainability in the urban environment and is supported by the City of Fremantle.

Sustainability and community

Of critical concern is the lack of awareness and succinct and concise information on sustainability and the education of the community is critically vital if Western Australia is to achieve a sustainable future. The proposed actions in the education section largely relate to educational institutions and the City of Fremantle expects that this is broaden to include the entire community, government agencies and industry. The proposed actions and targets in this section should be changed to reflect a whole of community based approach to education and awareness for sustainability.

Sustainability and business

Sustainability and business is especially important for the City of Fremantle, based on its diverse economic structure. The City of Fremantle is supportive of proposed actions for training and facilitation for sustainability but would like to see proposed action 6.4 to include local government input in enterprise facilitation as many local governments now have some form of Local Economic Strategies to encourage business development and opportunities.

Proposed action 6.7 has the potential to significantly change the way in which the Western Australian economy operates and the City of Fremantle suggests that this action is revised to “examine the ways in which subsidies and other financial mechanisms are having positive or negative effects on the health of the environment, society and economy and to propose and implement a course of action to address subsidies and mechanisms which have a negative effect to facilitate sustainability”.

Finalisation of the Strategy

The City of Fremantle recognises that this draft strategy is the first step in the many towards a sustainable future and the implementation of the actions proposed, an equally important step. The City of Fremantle supports the development of the detailed Implementation Program but also suggests that this is associated with a public review period to ensure expectations are adequately met. In addition, an effective and engaging Communication Plan for the Final Strategy will be required to gain local community support, now and into the future. The Communication Plan should be implemented and supported by dedicated staff within government with adequate resources.