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**SUBMISSION ON**

***FOCUS ON THE FUTURE: THE WESTERN AUSTRALIAN STATE SUSTAINABILITY  
STRATEGY***

**CONSULTATION DRAFT  
SEPTEMBER 2002**

**Prepared by the City of Gosnells, March 2003**

## **1.0 INTRODUCTION**

The City of Gosnells regards the pursuit of sustainability as crucial to a bright future and commends the state government for its production of a State Sustainability Strategy. The following comments are provided to assist in refinement of the State Sustainability Strategy Consultation Draft, by drawing attention to particular areas that the City considers either significant, of concern, or deserving of more exploration.

Local government through its grassroots involvement with and influence over all three spheres of sustainability, has a significant role to fulfil in achieving many of the objectives outlined in the State Sustainability Strategy (the Strategy). The potential for such involvement is alluded to in many parts of the Strategy, however what would actually be required of local government and how these additional responsibilities would be resourced is not explicitly stated. It is recognised that these issues are complex and will need to be explored further as part of any implementation program.

In relation to the State Sustainability Strategy, the state government should recognise the valuable contribution that local governments can make by:

- Acting as a conduit between external agencies and internal community members.
- Providing community audits of the services available already within a community and linking these together to ensure that there is not duplication or inadequacy.
- Drawing together the three principles of sustainability into community life through the way it operates itself.
- Providing social audits of communities and their social structures.
- Facilitating and providing local solutions for local issues.
- Providing linkages into local communities of interest.
- Providing linkages from state and federal government service providers to the local community.

## **2.0 GENERAL COMMENTS**

- The City of Gosnells strongly supports the preparation and implementation of a sustainability strategy for the State, however such a Strategy should not place additional responsibilities on local government unless they are provided with adequate additional resources.
  - Local governments have evolved significantly over time to ensure that the changing needs of their communities continue to be met. However, an incremental devolution of state and federal responsibilities in a number of local areas has resulted in budgets being placed under increasing pressure. To ensure that the desired outcomes of the State Sustainability Strategy are achieved, a clear allocation of responsibility across the three tiers of government is necessary.
  - The attention to detail in the area of implementation is inconsistent. In some areas the proposed actions are very specific, whereas others seem yet to be developed. This makes it difficult to clearly understand the role that the Strategy is intended to fulfil. To ensure that the Strategy provides a useful tool to aid in the development of a
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sustainability framework across the State, it is considered that the area of implementation needs to be expanded.

- The Strategy lacks clear allocation of priority. It is considered that to increase the Strategy's effectiveness short, medium and long-term goals need to be established across the regions.

### **3.0 COMMENTS ON PARTICULAR AREAS**

#### **3.1 Sustainability and Governance**

It is essential that the state government's role in facilitating a sustainable future for WA includes the provision of resources, capacity building and technical support to assist local government integrate sustainability principles into its decision-making processes, and that these processes are integrated with those of the state and federal governments.

- **Sustainability assessment**

It is unclear from the Strategy exactly which state government department will take responsibility for overseeing the introduction of sustainability practices and sustainability assessment into the State's administrative agenda. It is considered that the Western Australian Planning Commission and related Department for Planning and Infrastructure have the potential to offer the most holistic approach. However, the City recognises that with the restructure of other departments such as the Department of Environmental Protection there may be other options.

If the restructured DEP (Department for Environment Water and Catchment Protection) is utilised for overall sustainability assessment and advice, particularly given the nature of their existing powers and legislation, it will be important that the interests of the physical environment are not routinely placed above economic or social factors. This is particularly relevant given this department's power to override decisions of other agencies and local government.

- **Institutional Change**

The challenge of institutional change is faced by all levels of government with the existence of different levels of understanding and appreciation of the concept of sustainability. Moreover there is a risk of having varied groups seeking to skewer the rationale based on area of interest. The most fundamental tool in operationalising such institutional change is linkage to budgets, agreed measurement/assessment tools and comprehensive education programs.

- **Agency sustainability**

The City of Gosnells has commenced investigations into an appropriate process of sustainability assessment for the City, however it would be beneficial to have an agreed model for state and local government. The significant challenges of establishing such tools is recognised.

To be effective, such a model will need to be championed by all senior level personnel across state and local government, and should be developed to cover all areas of organisational management.

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- **Partnerships for Action**

The partnerships proposed are strongly supported, however it needs to be recognised that a uniform commitment to the framework is unlikely. As for state agencies a linkage through to resources/funding would be beneficial.

The Western Australian Local Government Association is listed as a partner, however the overall role of local government is not clearly established. Local government has economic, environmental and social responsibilities, and as such its participation must similarly be balanced in relation to each area. The Perth Economic Development Forum is a group of local government and economic development professionals that meets to address common issues that affect the Perth metropolitan area. Whilst this is not a formal group it does represent a link between local government and the general business community. It is considered that this group's input into the Strategy would be useful.

It is also considered that many opportunities exist for the state government to increase its role as a facilitator of partnerships. Government has a key role in identifying potential relationships between organisations and facilitating linkages with appropriate agreements. The state government's Industrial Waste Exchange program provides a good example of synergistic exploitation - what is one company's waste may be another's raw material.

The City of Gosnells has already demonstrated its capacity to work with the state government, most notably in the context of its award-winning *Revitalisation of Gosnells Town Centre Scheme*. Experience gained in this process will provide guidance towards sustainable interactions between the State and local government, and the City wishes to reconfirm its commitment to developing another similarly strong partnership with the state government in the development of the Maddington/Kenwick Sustainable Communities Initiative. It is anticipated that this initiative will have strong links to the State Sustainability Strategy, in particular the priority action area of Revitalizing Declining Centers and Suburbs.

Whilst it is recognised that regional partnerships can provide efficient frameworks within which to develop and implement sustainability strategies, the development of regional councils for this purpose must be more fully explored and approached with caution. It should be noted that much of the legislation enabling local governments to influence sustainability outcomes lies outside the Local Government Act (e.g. the Town Planning and Development Act), as such it would be critical for the roles of regional councils to be clearly defined and limited to prevent duplication of services and the creation of an inadvertent fourth tier of government. Notwithstanding this, the City of Gosnells is keen to work with its regional partners, and has already established successful examples of this in a number of areas including catchment management and greenhouse gas reduction projects.

- **Planning for Sustainability**

The Western Australian Planning Commission has many of the tools required for implementation of the Strategy at a policy level, and duplication should be avoided (ie change existing policies to be consistent rather than developing new tools), however this can only be effective with changes in approach with other agencies (particularly the Department of Environmental Protection) to allow appropriate application of the policy position.

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The state government must consider introducing statutory provisions for the linking of transport, services, commerce and residential development along sustainable lines. One example of this would be the progression of Liveable Neighbourhoods from its current “optional” status to a more formal Statement of Planning Policy.

Lot orientation and size, transport planning, designing out crime, facilitating mixed-use areas, providing commercial and community foci are essential elements of good urban design that contribute to sustainability and must be promoted, if not mandated.

It must also be recognised that development is not solely about statutory controls, and that the planning focus should be broadened to stimulate shifts in developer culture. The message that planned sustainable communities can, and do, sell must constantly be relayed to developers, as they are in many instances those most directly responsible for implementation of sustainability objectives.

The introduction of local planning strategies has encouraged local governments to plan more strategically for the future. Such strategies have the potential to be expanded to include sustainability principles and objectives. Given the limited resources that most local governments have available to prepare strategic planning documents, the combination of planning and sustainability strategies would be far more favourable than a requirement for local governments to prepare separate sustainability strategies.

It is likely that the introduction of incentives to encourage sustainable development will be required to overcome the current situation where the market is not mature enough to compromise economic outcomes with social or environmental outcomes. It is considered that economic levers will need to be developed and that the Western Australian Planning Commission has a role in this area. Density bonuses or the development of systems that seek to fast-track approval processes for ‘sustainability friendly’ development should be explored.

There is a need to consider possible processes for the assessment of the sustainability of major development proposals. There are currently no statutory requirements for local government to assess the sustainability of development and building applications. Many Australian local governments have attempted to overcome this inadequacy by preparing Sustainability Plans based on the approach outlined in Local Agenda 21. The Sustainability Plan sets the local government’s requirements for addressing sustainable development based on local values. Development of an overarching planning framework in the format of a Statement of Planning policy would be beneficial. This should address general principles with requisite local policy providing specific operational detail relevant to the local context.

- **Sustainability in the regions**

It is important that assistance from state and federal governments in relation to sustainable economic development is not concentrated on non-metropolitan areas, with an assumption that metropolitan local governments have a lesser need. Financial assistance available to local government to promote economic development is very limited with the vast majority of federal government funding aimed at regional, non-metropolitan areas. This focus purely on the regions at the expense of metropolitan areas is unsustainable.

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- **Indigenous communities and sustainability**

It is important to include indigenous communities within the metropolitan area, and provide resources to these local governments to assist in developing the actions listed.

- **Sustainability information on-line**

The expansion of existing information systems to achieve a ‘one-stop-shop’ for sustainability information is strongly supported. However, care must be taken to avoid duplication of other services or potentially isolating sustainability issues from existing areas. It is essential to recognise that ‘sustainability’ is not a product in its own right - rather it is a process of modifying the way that we carry out all of our current activities.

- **Recognising sustainability excellence**

It is considered preferable for recognition initiatives to be integrated into existing awards schemes rather than creating new ones.

### 3.2 **Contributing to Global Sustainability**

- **Biodiversity**

The City supports the vision and objectives outlined, however it is considered that biodiversity in relation to aquatic ecosystems is not adequately addressed. Whilst it is acknowledged that aquatic ecosystems are dealt with in section 5 *Protecting Aquatic Ecosystems*, this section makes little reference to biodiversity.

In addition, the following additional biodiversity indicator is suggested – “*Number of threatened species and ecological communities remaining outside areas managed or set aside for the purpose of conservation*”.

- **Greenhouse**

The City supports the vision and objectives, however the proposed actions seemingly omit the land clearing issue, which, although dealt with in a different context elsewhere in the document, should be listed as a significant contributor with appropriate proposed action(s).

Proposed actions should also include community initiatives, from direct action to education. These may be elements of the State Greenhouse Strategy, but are considered significant enough to be listed.

Proposed actions fail to take account of the significant economic opportunities, both local and global (see objective) available through the development of technologies and other marketable commodities. Proposed Actions must include a focus on R&D, thereby offering the potential to “*participate in new global opportunities*”. Specific reference must be made here to the withdrawal of Commonwealth funding to Australian Cooperative Research Centre for Renewable Energy (ACRE), based at Murdoch University.

Proposed actions, indicators and targets must include monitoring and reporting of the State’s greenhouse gas emissions.

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- **Oil vulnerability**

The proposed actions could be expanded to include rewards for innovation and incentives that promote the use of alternative energy sources.

### **3.3 Sustainable use of natural resources**

- **Aquatic systems**

The Vision and objectives outlined are generally supported, however specific reference must be made to the biodiversity values of aquatic ecosystems. Similarly, no mention is made of ecotourism potential or biodiversity exploitation. This omission needs to be addressed.

Actions under way and proposed actions focus on aquatic systems, but fail to recognise in depth the integral relationship between catchments and aquatic ecosystems. Catchment management must be identified and addressed, beyond proposed action 3.40, as crucial to the protection and maintenance of aquatic ecosystems. In addition, proposed action 3.37 must also consider cumulative impacts in addition to individual impacts.

### **3.4 Sustainability and Settlements**

- **Managing urban and regional growth**

Priority is required for the *Greater Perth* project (formerly *Future Perth*) as urban growth vision and associated planning policies are seriously out of step with sustainability objectives. The *Bush Forever* strategy also requires attention, given its conflict in parts with developing sustainable urban form and the additional measures that are often sought by other agencies (i.e. the Waters & Rivers Commission) outside of this framework.

- **Revitalising declining centres and suburbs**

These actions are strongly supported, particularly given the issues associated with distribution of wealth and opportunities. The City of Gosnells actively seeks to continue its partnership with the state government for the Maddington/Kenwick Sustainable Communities Initiative, which may act as an example of a regeneration exercise where government housing does not form a significant proportion of the housing stock.

It is anticipated that the Premier's announcement on 5 February 2003 to work in partnership with the City during the planning stages of the Maddington/Kenwick initiative will significantly contribute towards the project's success, and in this regard, the project is considered to provide an ideal opportunity for the 'Reviving the Suburbs' trial.

It is considered that some caution must be exercised in any attempt to standardise these types of initiatives through the creation of a guidance model, as although there will be some key lessons in common, different communities will need different approaches depending on local circumstances.

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- **Integrating land use and balanced transport**

These actions are strongly supported, however models of application need to be developed, particularly within a suburban context. There is also a need for certainty in transport provision if planning systems are to be applied, however it is acknowledged that this may be addressed in part through action 4.25.

- **Reducing and managing waste**

The City of Gosnells supports a coordinated approach by the state government to waste management, with sustainable management through emerging technologies as a core principle. The City reiterates the need for greater involvement by the state government in the waste management area.

“Green” procurement by government is acknowledged as an effective means of stimulating the waste management and recycling industry. A coordinated approach to green procurement across all levels of government is required, and it is strongly recommended that local government be included, or given the opportunity to become involved in any green purchasing agreements that the State government negotiates. Similarly, green procurement policy should be a matter for shared input and implementation. A consistent approach is essential.

The Thomas Road Recycling Facility in Kwinana is an example of best practice waste minimisation in the State. This site recovers construction and demolition waste, a major part of the waste stream. Improved incentives are needed to encourage this type of innovative facility over traditional landfill as it is considered that the current environmental levy does not provide a sufficient ‘carrot’. In addition, it should be noted that once started, this type of facility will need to be protected against the establishment of traditional landfill sites operating in competition, as this may undermine the viability of the more sustainable operation.

- **Sustainable energy**

With regard to renewable energy, funding is biased towards small scale (not profitable) and large scale projects. The medium scale, which is where local government is most likely to be able to intervene, has limited funding opportunities. This needs to be further investigated.

- **Preserving cultural heritage, landscapes and creating ‘sense of place’**

Local governments need greater powers to protect places of local heritage significance, which are by their nature (i.e. not of State significance) not provided with statutory protection under the Heritage of Western Australia Act 1990. As these places are demolished or destroyed, there is an incremental erosion of the feeling of ‘sense of place’.

### **3.5 Sustainability and Community**

For social sustainability to be in itself, sustainable, it is vital for all the stakeholders within a community to decide what they want to *value* as sustainable. External standards of what is valued as sustainable may not meet with agreement from a local community perspective. Thus, if external standards of sustainability are placed onto a community, rather than being developed with a community, there is a real risk of these standards being placed on a *community shelf* rather than placed within how a community functions.

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- **Housing and sustainability**

Recognising that changes to the Building Codes of Australia are imminent, the City of Gosnells urges the state government to take a further step and mandate energy efficiency standards for residential and commercial buildings.

- **Sustaining healthy communities**

Local government plays a key role in creating an environment that facilitates health and wellbeing amongst its community through influence over areas such as city planning, employment, social support, transport and community participation. Furthermore, local government can influence the way in which people can take part in the life of their community through such things as the election process, consultation exercises and cultural and recreational activities. A sense of participating in the community is itself a factor influencing health.

The potential for local governments to address inequalities in health through addressing the underlying social, economic and environmental factors should be recognised and resourced accordingly.

- **Education and community awareness for sustainability**

The importance of education cannot be under-emphasised. The sustainability message has to compete with thousands of other messages that bombard individuals each day and as such, the principles have to be marketed in a creative and effective way.

### **3.6 Sustainability and Business**

In relation to business, the Strategy provides a theoretical rather than practical perspective. Many of the influences on business that determine bottom-line results come from the federal government, and as this is the case, there is greater potential to redistribute incentives from the federal level than that of the State. The Strategy does not recognise the potential of the State to influence the Commonwealth or lobby the Commonwealth to alter business conditions to promote sustainable business practices or to create incentives that stimulate the commencement and growth of sustainable industry.

In addition, the document seems to focus on large business as large-scale users of resources. The partnerships listed in the document do not seem to provide an avenue for small business representation or a strategy to inform and educate small business about sustainability. The majority of West Australians work in small business. This sector of the economy needs to be heavily involved to actually access the majority of economic activity.

Support must be provided to local enterprises that are sustainable, employ local people and use locally produced goods and services. Local governments require support to attract local industry, and to propagate the “business incubator” concept.

- **Financial reform and economic instruments for sustainability**

The debate that rages on individual tax audits regarding investment in “alternative”, agricultural businesses and the level of tax rebate claimed through such schemes can only serve to discourage investors from entering into schemes that focus on West Australian products (tea tree oil, sandalwood, etc). The Strategy should recognise that the State has a role to play as a lobbyist for economic reform that promotes sustainability. One way of doing this could be to ensure that sustainability is placed on

the agenda for meetings between the Prime Minister and State Premiers with the aim of engendering a federal response in line with key initiatives at the various state levels? This would seem to be the logical next step, advancing the debate from an academic level to a more practical policy level.

This is particularly important in financial markets and in ensuring that sustainable business benefits from incentives. Perhaps there could be more explanation of the difference between subsidies and incentives included within the Strategy.

- **Eco-Efficiency and industrial ecology**

There is potential to improve eco-efficiency by tying business to the products that it produces in much the same way as is happening in the mobile phone industry - where up until recently phones were simply discarded rather than repaired. Creating the incentive to repair and reuse is one way that government can help improve industry practices or even form the basis of new industries.

- **Recognised international incentives**

The Strategy does not outline the State's position in relation to the treatment of carbon sinks or carbon credits as major incentives that have the potential to create industry, to address salinity and give business a mechanism to address issues in other ways. This issue highlights the State's limited control over particular aspects of sustainability, and hence the need for concerted efforts to force change at the Commonwealth level.

#### **4.0 CONCLUDING THOUGHTS**

- The City of Gosnells strongly supports the development of the State Sustainability Strategy, and is ready and willing to actively participate in progressing its own, and the state government's sustainability agenda. The City reiterates its willingness to act as a State/local government model in delivering sustainable community outcomes.
  - To ensure that sustainability becomes embedded in our every-day activities, governments must demonstrate leadership. This leadership relates to all areas of operation including investment in ethical investment funds, which will provide some of the much-needed capital for sustainability initiatives.
  - Consideration needs to be given to the long term resourcing of local government sustainability initiatives/responsibilities. Although local government has a responsibility to promote changes that are in the broader community interest, sustainable development may not necessarily be seen as core business. Even amongst local governments that are committed to adopt such initiatives, there is a general reluctance to start any new programs where external funding will be limited and/or of a short-term nature as there will still be ongoing financial commitments.
  - The strategy remains a visionary document, with limited direction in a number of areas. For successful implementation of this strategy action plans must be prepared that set out clearly where roles and responsibilities lie. In this regard, if it is proposed to utilise local government to meet sustainability objectives then resources must be provided accordingly, which would include not only financial resources but also expertise and the development of workable models for processes such as sustainability assessment.
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