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## **SUBMISSION ON THE WESTERN AUSTRALIA STATE SUSTAINABILITY STRATEGY**

The key focus of this submission relates to what sustainable development is proposed to mean to decision-makers. The other parts of the Strategy demonstrate a generally commendable way of embracing a wide range of issues and dropping them into a sustainability framework and have not, accordingly been commented upon in detail.

### **What is “sustainable development”?**

The draft Strategy defines sustainability as meeting the needs of current and future generations through simultaneous environmental social and economic improvement. Development should meet the needs of the poor without causing environmental problems. “In other words development must meet the needs of current and future generations through simultaneous social environment and economic improvement of the human-ecological system.” This quotation is from the State Substantiability Strategy not from Brundtland which is not written to suggest that all elements must equally progress to enable each country to achieve its full economic potential whilst at the same time enhancing its resources base. At the outset the draft Strategy over-sells the need for simultaneous improvement, and therefore the no-trade offs approach. Fortunately this is toned down as one progresses through the report – through the principles and the section on governance.

A no trade-offs approach would be impossible to achieve in many cases. It must be understood that a definition of sustainable development that allowed for no trade-offs in order to secure environmental gains could be equally applied to economic and social objectives and thereby, for instance, prevent environmental gains where economic trade-offs were required. Presumably it would not be possible to put an end to logging of old growth forests, as this, on balance, is an environmental trade-off against economic objectives. Similarly the protection of Bush Forever sites would only achieve environmental objectives by incurring economic costs to landowners and the taxpayer. So unless decision-makers are also able to make trade-offs in the simultaneous achievements of objectives, all decisions would stall.

So it is comforting that a careful reading of the relevant sections, leads to the conclusion that the draft Strategy does not unequivocally reject trade-offs or

reject the prospect of sustainability being achieved by securing a net benefit. As noted in the draft Strategy (p.38) some plans or projects may have an adverse impact on some sustainability principles and some trade-offs are inevitable. However, this will be acceptable provided it does not compromise the government's ability to achieve any of its sustainability principles and it has a greater net benefit than alternatives when all relevant economic, social and environmental factors are taken into account. One can only assume that the simultaneous achievement of economic, social and environmental objectives has been dropped as a non-negotiable facet of sustainable development. If this is so the actual definition is inconsistent and ambiguous. It should be changed to revert back to the Brundtland definition or at least reflect the acceptance of sustainable development being achieved by net environmental, social and economic improvement.

### **Bureaucratic implications**

The draft Strategy appears to argue for an additional layer of bureaucracy. Sustainability assessment is to be a new process for checking that sustainability is promoted. One suspects that the result will be a planning assessment (under a different name) of a planning assessment - of questionable purpose! The proposed establishment of sustainability assessment unit in the EPA (for environmental), DPI (for social) and Treasury (for economic) runs the risk of running counter to the objective of securing greater integration of the elements of sustainable development. It is likely that the separate entities will require another layer of bureaucracy (perhaps to be called "the Sustainability Police") to enforce adequate liaison with each part. Possibly the inertia arising from "silos of government and disciplines of professions" complained about on page 36 will be recreated by the Strategy itself.

### **Other general comments**

There is a tendency of the State sustainability Strategy to lose focus by embracing all aspects of government. The focus should be on sustainable development, not all things that can be done to make the world a better place. By embracing heritage, Indigenous affairs, justice, disability services, health and even the arts and multiculturalism the strategy tends to lose its way. Improved techniques of consulting the public should be supported, but is this really integral to sustainable development? This said, the draft Strategy is a large improvement on the pre-published draft and one can understand the tendency to draw the net too widely.

It is somewhat ironic that the Keating Review (Review of the project Development and Approvals System), which was unable to find areas of red tape to cut (as was its brief) instead plumped for the incontestable motherhood that development should be more sustainable. The conclusion is not supported by research or full justification. The draft Strategy makes too much of this conclusion suggesting that government reports are conveniently feeding on each other.

It is not possible to take a purest view of sustainable development. Development cannot be “sustainable” in the purest sense of the word which appears to be the wording advocated in report. The aim should be for development to become more sustainable. For instance, the example in given in the report of the desire of the Perth Zoo become the world’s first sustainable zoo. Taken literally this is consume all the eucalyptus of South Perth. Clearly the zoo requires large inputs from elsewhere to sustain it. But the zoo could certainly progress to greater sustainability through a host of improved practices – one should applaud that but it is doubtful whether one can ever say it is truly and completely sustainable.

There are a number of inaccuracies in the section on *Planning for Sustainability* that could be corrected.

Note that there is only one Metropolitan Region Scheme and the sentence on page 55 could read “Local Town Planning schemes are an important mechanism for addressing sustainability issues in the statutory process as well as the Metropolitan Region Scheme and Country Region Schemes and regional Plans”.

It should be noted, on the penultimate paragraph of page 55, that some of the statements pf Planning Policy quoted have as yet not been finalised or even prepared, so they are not actually “current”.

It may facilitate the achievement of the vision for regional acres, discussed on page 56, to utilise the work undertaken in conjunction with regional development commissions in the late 1990s in respect of the *State Planning Strategy*. This Strategy provided a vision for each region, which was the subject of considerable consultation and discussion and could be stating point at least for further refinement.

It is stated (on page 57) that some regional councils of local government have demonstrated regional sustainability planning. While this is asserted, it may be that little has demonstrated other than the writing of reports and the desire to be involved. It is unclear whether regional councils are to be given statutory powers, presumably at the expense of local government, to enable them to implement the Statements of Planning Policy, or wether they will be advisory only.

There is a risk of over-selling the use of Statements of Planning Policy. It should be recognised that such policies need to be soundly based and it would be difficult to achieve anything of substance if they were not related to providing guidance to authorities on how to make decisions where development is contemplated. Such policies which aim to make things happen would probably be ineffective however unassailable the rhetoric may be.

One approach that has not been grasped is that through the preparation of town planning schemes, particularly through the preparation of local planning strategies, considerations relating to sustainable development could be better debated and policies to be included in schemes justified.

Thank you for the opportunity to comment.

Yours Sincerely

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