

SUBMISSION TO DRAFT STATE SUSTAINABILITY STRATEGY

INTRODUCTION

In October 1997 the Planning Institute of Australia adopted a policy on Ecologically Sustainable Development which includes the following seven statements :

- **PIA supports the basic principles of Ecologically Sustainable Development (ESD) as outlined in Australia's National Strategy for ESD.**
- **As an advocate for the principles of ESD, PIA will encourage planners, governments at all levels, the private sector and the wider community to embed the basic principles of ESD into all policy making, planning and development functions and activities, into relevant legislation, state and federal, and in particular, to incorporate them into strategic planning documents and into land use planning instruments.**
- **PIA will lobby Governments at all levels to adequately resource policies and programs aimed at achieving the principles of ESD.**
- **PIA members have a responsibility to *integrate* the principles of sustainability into decision making that affects the environment and natural resource values.**
- **PIA members have a responsibility to make recommendations that achieve *ecologically sustainable development outcomes* and will result in the progress towards ESD.**
- **PIA members should ensure that the environmental and ecological impact of plans and development proposals are considered, and that the impacts of development are capable of being *measured and evaluated*.**
- **PIA members should ensure that they are informed about available best practice in achieving ecologically sustainable development outcomes.**

This demonstrates the commitment of the Institute to the objectives of promoting sustainable development.

This submission is made on behalf of the Planning Institute of Australia (Western Australia) which currently represents professional planners employed in the public and private sector throughout the State. It follows on from the submission to the Discussion Paper submitted in 2002 and provides both general and specific comment on the goals, priority areas and actions proposed in the Draft Strategy which can be most influenced by the planning system and processes which operate throughout the State.

The submission has been compiled in liaison with the Australian Association of Planning Consultants (WA)

GENERAL COMMENTS

The initiative by the Department of Premier and Cabinet to prepare the Strategy is commended as it represents a serious attempt to explain and promote the concept of sustainability and to raise the level of debate and understanding of the objectives of sustainability in both the private and public realm. The Strategy establishes clear goals and proposes priority areas and actions to implement these goals.

The Strategy deals with a complex issue comprehensively and this has produced a lengthy and detailed document. The inclusion of summaries of recommendations and graphical illustration of the Strategy and separation of the Strategy into distinct areas has partially overcome some of the difficulty in understanding the purpose and intent of the document.

The Strategy has moved away from broad based motherhood statements and included a very comprehensive list of priority areas and actions. The Strategy does not address the resourcing implications of such recommendations and an Implementation section which prioritises actions and identifies financial and funding sources for such actions should be an integral part of the document.

The Strategy does not explicitly acknowledge that an approach to sustainable development which involves a change in approach or thinking may be in conflict with current trends and contrary to the shorter time horizons of land developers and consumers. The notion that existing processes will be difficult to change because of “the silos of government and disciplines of professions” does not acknowledge that these processes are often a direct response to community and political pressures and that the public are not likely to acquiesce simply on the basis that sustainability outcomes will be achieved.

The document does not emphasize that the implementation of the Strategy will involve substantial commitment of public resources to provide the necessary data and skills for the improved assessment of plans and proposals required particularly at the state and local government level. In a political environment which repeatedly calls for less regulation and less resourcing of public agencies, these are potentially contentious issues. It is possible that if these two underlying and potential contentious recommendations were clearer in the Strategy, it may have attracted more media and public interest and debate.

The notion that sustainability assessment is a new process is not supported. While spatial planning has not in the past been explicitly aligned with sustainable development, the accepted methodology associated with preparation and assessment of plans adheres to the broad goals identified in the Strategy. The planning process is required to address all the issues referred to in the Strategy as the triple bottom line and is capable of and in many instances has focused on producing good integrated outcomes from a social, environmental and economic point of view. There are many examples of such processes being undertaken by proactive and progressive consultants, local governments and other agencies which have demonstrated sustainable outcomes.

Whilst in the past the economic issues often played a dominant role, the introduction of environmental assessment legislation in 1996 and the increasing involvement of vocal and well organized communities and action groups has had a significant influence on planning decision making over the past decade. The Strategy correctly acknowledges that overemphasis on any of these factors does not lead to the most satisfactory sustainable outcomes.

It is submitted that the emphasis in the Strategy should be on how to improve understanding of the economic, social and environmental impact of plans and proposals to achieve balanced outcomes and to improve the use of existing planning instruments to efficiently undertake this task. This is dealt with in more detail under Sustainability and Governance

SUSTAINABILITY AND GOVERNANCE

Sustainability Assessment

Effective sustainability assessment is the crux of the Strategy and the area in which the planning process has a significant role and responsibility.

Current problems associated with undertaking integrated sustainability assessment within the planning process include:

- the lack of quality data on environmental, social and economic impacts of plans and projects.
- the shortage of planners and other practitioners in both the private and public sector with broadbased skills to undertake integrated compilation and assessment of plans and proposals.
- planning is often undertaken at a distinct spatial level which does not always acknowledge the interconnections between spatial areas and their impact on sustainability.
- increasing pressure to fast track assessments and often difficulty in obtaining the local and state political commitment to sustainable outcomes in the face of strong and sectionalized public opposition.

The application of this approach to government agencies and their projects initially is supported. Public land is extensive in the State as is the employment base of the public service . Responsible sustainability assessment of major projects can provide good demonstration projects to set the example and provide the catalyst for sustainable development on private land.

Assessment of plans from a sustainability perspective at the state and local government level involves a sound understanding of impacts on the environment and can seldom be operated through a simple checklist process . The use of checklists lends itself to more prescriptive processes such as those included in the RCodes but would have limited application where objectives are complex and not easily quantified. Sustainability assessment relies first on the gathering of good quality and comprehensive information and clear reasoned analysis of the data to evaluate the impacts. Access to such

information on environmental, economic and social factors is often limited and will often will require effective public consultation and communication.

Improvement of this process will be gradual but will rely heavily on the production of good quality strategic and policy planning frameworks to provide guidance in this respect and the use of improved techniques for decision making. The development of sustainability indicators is recommended in the Strategy and their successful use will depend on their suitability, appropriateness and the precision of their relationship to sustainable outcomes.

In short sustainability assessment is likely to involve more skilled resources, more time and involve substantial training until the principles and practices are well established.

Given the numbers of projects, plans and programs developed at the state and local government level, it would not be practical or efficient to separate the responsibility for sustainability assessment into three government agencies as recommended. Whilst each of the agencies and many others can provide the essential data on their areas of expertise, there needs to be one agency responsible for the task of integrating this data and making the decision on the outcome. Current legislation places the responsibility of decision making on state or local government planning agencies and this needs to be acknowledged in the Strategy.

The Sustainability Policy Unit can provide the background research and support for this process but without substantial legislative or policy change cannot determine the outcomes of the assessment process.

Institutional Change

Institutional or legislative change should not occur before sound analysis of the strengths and weaknesses of the current processes and the opportunities for changes which will contribute to achieving more sustainable outcomes.

In this regard reference is made to the introduction of environmental assessment legislation in recent years which has not produced efficient or necessarily more sustainable outcomes from the perspective of preparation and processing of plans.

Similarly, the benefits of amalgamation of some government agencies in recent times are still to be realised.

Embracing Sustainability in Government Agencies

In addition to the recommendations in the Strategy, State Government can demonstrate leadership in this area by the development of initiatives such as green purchasing, sustainability assessment techniques and sharing of all this information

Partnerships for Action

The significance of the role of local government in implementing the Strategy is recognized in the Strategy. This tier of government requires strategic planning support from State Government and close liaison on planning issues given the respective roles of each tier in dealing with planning matters. The Round Table concept is strongly

supported as it has the benefit of bringing the parties together on an informal basis to achieve mutually acceptable goals. It also provides the opportunity to share information and provide much needed assistance to the many poorly resourced local governments in the regions.

The creation of additional regional councils is questionable as it effectively provides another tier of administration and uses increasingly scarce resources. It is recommended that the effectiveness of such regional councils be examined with particular regard to their implementation of sustainable outcomes before actively pursuing the creation of any more. Many local governments achieve such outcomes through working cooperatively and more informally without having to attend and service administrative structures.

Planning for Sustainability including Sustainability in the Regions

The Strategy recognizes that the planning process in WA provides a powerful mechanism to apply the principles of sustainability. It states that the core process in sustainability consists of:

- Finding a strategic vision of the future which is the desired outcome for a majority of the community based on common good principles.
- Setting out practical steps that integrate economic, social and environmental outcomes relevant to that vision and which can be taken through every element of development.
- Embedding this through statutory processes and procedures where appropriate to make a significant contribution to the State Sustainability Strategy

Regional Strategic Planning

Strategic planning in the State is provided for in the State Planning Framework which is a central framework for existing State and regional policies and plans.

The State Planning Strategy is 30 year plan which has a goal of ensuring that regional wealth creation based on the principles of environmental, social and economic sustainability will generate enormous benefits to the community including more employment, a higher standard of living and increased expenditure on public programs and infrastructure. It establishes key principles relating to the environment, the community, the economy, infrastructure and regional development. It then identifies strategies and actions to achieve the main principles and monitors these on a yearly basis to measure the level of achievement and relevance of the Strategy.

The State Planning Strategy provides the overarching framework for Statements of Planning Policy, Regional Strategies, Regional and Sub- Regional Structure Plans, Strategic Policies and operational policies which provide direction for future development and growth.

These plans and policies are formulated and reviewed on a continuing basis in response to demands from the community, development industry, environmental and other interest groups. They deal with a range of localities and regions and a wide range of planning

issues providing guidance and direction to those agencies that make decisions on planning matters.

This provides for a regional planning framework throughout the State which provides essential broad based guidance for planning for a sustainable future. It is important that these plans continue to be prepared and reviewed to reflect changing circumstances and provide guidance on future development and growth.

The time span of regional plans and the difficulties associated with implementing many of the principles when dealing with day to day decisions on rezoning, subdivision and development is an issue which has tested the validity and usefulness of such plans.

Statements of Planning Policy and Statutory Planning

The Strategy places particular emphasis on the use of Statements of Planning Policy to achieve sustainable development outcomes and recommends that compliance with such policies be reinforced by possible legislative change. These Statements provide general guidance on specific planning issues for sustainable planning outcomes. Similarly the Strategy places emphasis on the role of statutory planning which provides the management provisions for growth and development through zoning, reservation and scheme provisions.

Local Strategic Planning

There is less emphasis in the Strategy on a level of local strategic planning embodied in the Town Planning Regulations (the preparation of Local Planning Strategies) which can address growth, development and decline, how it can be managed sustainably and provide the framework for decision making. At this level of planning significant economic, social and environmental issues can be identified and planning put in place in advance to promote or protect these issues. The Local Planning Strategy can interpret the objectives and recommendations of the Regional Plans and Statements of Planning Policy and combine this with local demands and needs and incorporation of local initiative such as Local Agenda 21. It therefore has a unique ability to integrate both top down and bottom up strategies. Most importantly it is a community document prepared by local government and reflects the vision for growth and development over the more realistic time frame of 10 to 15 years.

It is submitted that the Local Planning Strategy which is required to accompany all town planning schemes since the amendment to the Town Planning Regulations in October 1999 offers the most significant opportunity to "tell the story" of each local government area, provide a vision for the future which is embraced by the community and local government and base this on sustainability principles. The opportunity to prepare such Strategies across local government boundaries is clear and some local governments have already recognized the efficiencies of such an approach. This document has the ability to encompass the issues contemplated in the proposed Regional Sustainability Strategies but with the advantage of approaching the issue from both a broad based economic, environmental and social planning perspective and a local planning perspective.

To satisfy the Town Planning Amendment Regulations 1999 a Local Planning Strategy should be :

- a document prepared in close consultation with the community which explains and justifies the strategic direction for growth and development in a local government area over the next 10 to 15 years.
- a document which sets out the direction for economically, socially and environmentally sustainable development based on comprehensive analysis of state, regional and local planning issues and objectives
- a document which gives direction both to local government, the Department of Planning and Infrastructure, WAPC and the Minister in assessment of amendments, subdivision, development and provides strategic planning support for sustainable decision making.
- a document which provides the basis for coordinated decision making on future servicing of the local government area by local, state government and any other service agency.

The importance of close partnership and resourcing assistance between State and Local government to produce such strategies needs greater recognition and this is an area which could be addressed by the Round Table forum.

Indigenous communities and sustainability

The focus on regional governance and management of indigenous lands is supported, Indigenous Regional Sustainability Strategies appear to focus on land management and community development, which is also strongly supported. There is a need to resource the Aboriginal Lands Trust [ALT], as the manager of the third largest landholding in the State. This particularly relates to the regulation of land use and development on ALT lands. It is vital that the ALT be resourced to manage its estate effectively, and to ensure that Aboriginal people are empowered to look after their community land.

It is essential for Government agencies to learn to work effectively with Aboriginal people, in ways that are culturally appropriate to different areas. Government agencies should not rely on a 'one size fits all' approach to their policies or programs, particularly in regions of WA where there are high proportions of Aboriginal people, i.e. Kimberley, Pilbara and Goldfields.

Research and Development for Sustainability

There are numerous studies which contribute to the task of sustainability assessment undertaken by or on behalf of agencies. There is an urgent need to consolidate and disseminate this information to avoid unnecessary duplication and identify gaps in the knowledge base. Effective communication of all initiatives whether on the Internet or in other form involving the implementation of the Sustainability Strategy will be a most efficient way to progress the pursuit of its objectives.

SUSTAINABLE USE OF NATURAL RESOURCES

This goal can be achieved through the strategic planning process as covered under the Governance section. It will require identification of natural resources and formulation of effective provisions to protect such resources from inappropriate development.

SUSTAINABILITY AND SETTLEMENTS

The objectives for this section can be achieved through effective use of planning processes as explained in the section on Governance. Other comments include :

- Growth management needs to occur in the context of comprehensive urban strategies such as Future Perth and the promotion of Liveable Neighbourhood Designs for all new areas of residential development with ongoing review of such standards to respond to changing conditions.
- Revitalisation of country towns and rural settlements requires more specific attention in the Strategy. Growth and development of such centres is severely constrained by the lack of physical infrastructure, delays associated with resolving Native Title claims and other issues which work against the objectives of sustainable settlement growth.
- Solar orientation requirements need to build on the approaches in the RCodes and BCA but should acknowledge that there are competing issues in the sustainability agenda. Smaller lots are encouraged in the interests of urban consolidation but the opportunity for design of buildings with passive solar design features becomes more constrained in higher density developments.
- There is current confusion regarding the State Governments position on local heritage management and interpretation of the Heritage Act of WA. The implementation of Heritage protection requires a clearer understanding of heritage principles and their integration with new development and in particular, commitment to funding and assisting local government to educate communities and resist local pressures for wholesale redevelopment of areas or places of heritage significance.

SUMMARY OF COMMENTS ON STRATEGY

- The initiative of the State Government to explain and promote the concept of sustainability in WA is commended
- Sustainability assessment is not viewed as a new process but one which focuses on well articulated and understood goals, is based on sound environmental, social and economic data and can be implemented through the effective use and constant improvement of current planning practice and processes.
- Sustainability assessment does not lend itself to a simple checklist approach. It requires skilled resources, good quality supporting data and is likely to involve more time.
- The Strategy needs to explicitly acknowledge the controversial aspects of the recommendations which require substantial resourcing of government agencies and some changes in current community expectations relating to acceptable development.
- The Strategy needs to include a realistic and effective implementation program with clear priorities and responsibilities.
- Changes to policy and legislation or to administrative and institutional frameworks to facilitate sustainability need to be based on sound analysis of current practices and comprehensive evaluation of options to ensure that outcomes are effectively and efficiently achieved.
- The importance of preparation of sound strategic plans and policies both at the regional and local level needs to be more clearly acknowledged in the Strategy.
- The value of the Local Planning Strategy as a framework for promoting sustainable development within and across local government areas needs to be recognised in the Strategy and the need to encourage and facilitate the preparation and ongoing review of such plans.
- Successful implementation of the Strategy will depend on the fostering of effective partnerships particularly between State and local government.
- Consolidation of existing research on environmental, social and economic issues, effective dissemination of such data and constant exchange of information to all agencies involved in sustainability assessment is an essential prerequisite to facilitating an improved assessment process.
- The Strategy needs to recognise that sustainable settlement planning particularly in regional areas is highly dependent on good infrastructure provision and timely resolving of native title issues.

