

This document is a submission by the City of Stirling on the *Western Australian Draft State Sustainability Strategy*. This submission was endorsed by the COUNCIL on 10 DECEMBER 2002. The Council resolved:

**That a copy of the Executive Manager Planning and Development's report dated 19 November 2002 be SUBMITTED as the City's response on the draft "Focus on the Future: The Western Australian State Sustainability Strategy".**

## 1. General Comments

- 1.1 Generally, the document is significant in the development of a more sustainable State and approach to governance. Given that it is increasingly recognised that a focus on sustainability is imperative to ensuring that future generations enjoy the same standard of living as is currently available, the initiative is to be commended.
- 1.2 Overall, the Strategy is a well structured document. The structure echoes the approach being pursued for the City's own Sustainable City Strategy (being drafted) and allows coverage of a wide range of interconnected issues.
- 1.3 The importance of the State Government accepting a lead role in the implementation of sustainability policy should be emphasised, given its role in funding and resourcing, guiding and / or authorising many important local government statutes. This submission focuses primarily on the actions that are considered the most relevant to local governments.
- 1.4 Many actions proposed in the draft Strategy will need to be implemented in collaboration with local authorities. This will, in many cases, require additional resources in terms of funding and expertise that may not be at the disposal of every local authority. There is a significant opportunity for the sharing of expertise and resources to assist local authorities with the implementation of the actions proposed by the Strategy.
- 1.5 Subject to agreement on the underlying principles, the suggested partnership arrangements with local government are supported. However the draft Strategy should recognise that community understanding of and support for the principles and recommendations are imperative if it is to be successfully implemented.

## 2. Sustainability and Governance

### 2.1 Sustainability Assessment

The City supports the introduction of an overarching integrated assessment process such as sustainability assessment and multi-criteria analysis (p 33). It would be appropriate for the Government to take a leadership role in developing these assessment systems, as the adoption of these systems often require resources beyond the means of local authorities. The City is currently analysing the possibilities of implementing an assessment system (decision making checklist) that could assist in the assessment of the sustainability of all major decisions. The adoption of a Sustainability Code of Practice (p 39) is supported as it will form common ground and will provide guidelines to government agencies on how to consistently implement decision-making tools into day-to-day activities.

***This action is generally supported.***

### 2.2 Embracing Sustainability in Government Agencies

Although it is accepted that sustainability processes are not necessarily the same for all agencies, it is important to achieve optimum efficiency by avoiding duplication of similar procedures. The Strategy could have a stronger focus on information sharing and standardised procedures between government agencies and between government agencies and local government. Examples of information sharing could include best practice on sustainability assessment, green purchasing and annual environmental performance reporting. Designing these systems is resource intensive and requires some specialist skills that are not

always available within all organisations. The Sustainability Code of Practice provides a mechanism to introduce standardised procedures.

***This action is generally supported.***

### 2.3 Partnerships for Action

The City supports the concept of a State-Local Government Sustainability Roundtable to develop a common sustainability framework (p 51). This process will facilitate an ongoing partnership between state and local governments to address issues surrounding sustainability. The success of this partnership may well encourage industry groups and community groups to form similar partnerships at the local level. The Roundtable provides the opportunity for information sharing between State and Local Government to maximise efficiency and to assist local authorities with the implementation of best practice examples of sustainability processes.

***Subject to reaching an agreement on the underlying principles, this action could be supported.***

### 2.4 Planning for Sustainability

The draft Strategy identifies the Town Planning and Development Act as a key tool to enable sustainability principles and processes to be incorporated into statutory processes at the local level. This will include exploring how Regional Councils could be created to address sustainability issues (p 51). The City is not opposed to these ideas, but is however concerned that this may lead to an additional level of 'government/administration' being introduced, with its associated costs. The City acknowledges the value of regional partnerships, but is of the opinion that these partnerships should be established on a voluntary basis and formalised by way of Memorandums of Understanding. Regional Sustainability Strategies (p 58) may provide the framework for the pursuit of sustainability at a regional scale, but should be based on the desire of local governments to work cooperatively to resolve particular regional issues.

The City acknowledges the opportunities that exist for Town Planning Schemes to incorporate sustainability and natural resource management principles and processes. It would be desirable for the legislation (or subservient policy and regulations such as the Model Scheme Text) to be amended to provide a stronger mandate for the inclusion of sustainability considerations into Town Planning Schemes. These Scheme provisions could include a range of natural resource management and sustainability issues such as urban stormwater management, soil conservation, vegetation clearance, passive solar design and water sensitive design. However, this step should only be taken after careful consideration of all the relevant factors and adequate public consultation, as other jurisdictions have had difficulties in implementing similar legislation due to its perceived abrogation of private property rights. An example of this is the introduction of the *Resource Management Act* by the New Zealand Government in 1991.

The state/local government roundtable will identify opportunities through planning processes and procedures to implement the State Sustainability Strategy (p 55). This process may provide the appropriate forum for the resolution of the issues mentioned above.

The Strategy fails to acknowledge that the Local Government Act could be amended to require the incorporation of sustainability principles into Council's Strategic, Corporate and Business Plans (as has occurred with community consultation). The Local Government Act also provides the opportunity for the inclusion of triple bottom line reporting into local government operations. It is acknowledged that the thinking is not to legislate for the inclusion of sustainability principles, but to give local government the opportunity to work collaboratively to introduce these principles on a voluntary basis. Perhaps amendments to the Local Government Act could be listed as a possible future action.

***Subject to the changes suggested above, this action is generally supported.***

## 2.5 Sustainability Information Online

The concept of a sustainability information website (p 70) is supported, especially where it could provide best practice examples or standardised procedures that can be adopted by local councils, without the need for large investments in researching techniques and tools.

***This action is generally supported.***

## 3. Sustainable use of Natural Resources

### 3.1 Sustainable Coastal and Marine Environments

Coastal planning can contribute to a sustainable coastal environment by reducing point source discharges and ensuring that non-point source discharges such as stormwater from roads carrying heavy metals are treated through natural bio-filtration systems prior to discharging into the sea (p 123). Bio-filtration systems could include vegetated areas, swales and stormwater retention ponds. Local authorities are the providers of infrastructure and therefore play an important role in the inclusion of natural resource sensitive urban design into development projects. The draft Strategy should address these issues in more detail and provide some examples of where these types of actions have been successfully implemented.

***This action is generally supported.***

The remainder of the submission was written to provide the Town Planning and Statutory Services Committee and the Council with a summary of the actions considered relevant to local governments, and specifically the City of Stirling. Support or opposition to the specific actions listed are only indicated generally, to provide the opportunity for the Council to debate the implications of the suggested actions.

## 4. Sustainability and Settlements

### 4.1 Managing urban and regional growth

*Encourage employment initiatives such as small business incubators for 'growing' job opportunities in outer metropolitan urban areas.*

**A strategy based on demographic need and a longer term strategy for employment and urban management could be supported.**

### 4.2 Revitalising declining centres and suburbs

*Trial 'Reviving the Suburbs' in partnership with a local government: In consultation with local government, progress higher density residential development by linking the provision of government infrastructure and services with commitments to local urban consolidation.*

**The City supports a partnership approach between State and Local Government and community stakeholders to undertake urban renewal and consolidation projects.** It is essential that local stakeholders are involved in these processes and priority should be given to projects where stakeholders can demonstrate the ability to work cooperatively. The Glendalough Station Precinct could provide a pilot project for this initiative.

There may be a need for the preparation of design guidelines to facilitate high quality infill development (where appropriate) in established residential areas, that ensure the protection of the privacy and amenity of existing residents. These guidelines could fulfil the same role as the "Liveable Neighbourhoods" design guidelines, but for established residential areas.

### 4.3 Integrating land use and balanced transport

- *Examine pedestrian needs on all local streets and in town centres to create pedestrian friendly environments.*
- *Research parking demand at suburban centres.*

- *Develop programs that increase mixed-use development in strategic and other regional centres with good public transport provision.*
- *Encourage local government to provide for flexibility in residential zoning, which allows small businesses and 'corner shop' retail facilities to locate in existing suburban communities.*
- *Encourage flexibility in local government parking policy in areas where there is good public transport.*

**These actions are generally supported.** The City has been informally requesting the Department for Planning & Infrastructure to research and provide substantiated, revised advice on parking standards for some time. The City already makes provision for home businesses and corner stores to operate in residential zones. The actions listed above are echoed in the City's Transport Issues Paper, adopted by the Council in November 2001.

#### 4.4 Managing freight and regional transport

*Develop a mechanism to manage conflicts between freight and residential activity, using zoning options to create incentives for property owners and site management options where necessary.*

**This action is generally supported.**

#### 4.5 Preserving air quality

*Continue to provide community information and education to change behaviour, especially on the burning of domestic wood fires and to encourage a shift to non-car modes of transport.*

**This action is supported.** Continuing to inform the community and generating public support for sustainability initiatives and changes in policy and lifestyle are imperative to the success of the Strategy.

#### 4.6 Reducing and managing waste

- *Encourage the use of recycled products by all government agencies, and the recycling of paper, glass, plastics, metals, and organic waste, as part of the government's Sustainability Procurement Policy and Sustainability Code of Practice.*
- *Require all Local Government Authorities to prepare waste management plans.*
- *Encourage all government agencies to reduce consumption and waste by undertaking a comprehensive audit of resource consumption and waste and setting targets for reductions.*

**These actions are generally supported.**

#### 4.7 Our Water Future

- *Establish guidelines for household use of grey water and encourage best practice in their application.*
- *Develop partnerships with local government to ensure that water sensitive urban design is built into all urban development.*
- *Ensure local government and Regional Councils, co-ordinated by the Department of Environment Water and Catchment Protection, take more responsibility for managing groundwater, including household and municipal bores and storm water collection, through the development of Regional Groundwater Management Plans.*

**These underlying principles are generally supported.** However, some concern is expressed at the expectation that local governments take more responsibility for issues such as catchment management. Support for these actions is expressed on the proviso that resources are provided for this. The devolution of responsibility for a range of issues to local government without adequate resourcing is, in itself, economically unsustainable and has the potential to lead to the lowering in standards in important areas.

#### 4.8 Sustainable Energy

- *Ensure Town Planning Schemes require solar orientation of new developments to achieve 80% oriented houses, and provides guidance on the re-orientation principles as part of all renovation approvals.*
- *Encourage building design and management for energy for all government buildings.*

**These actions are generally supported.** However, these actions would require the clear backing of the Western Australian Planning Commission through subdivision policies and the Model Scheme Text. The Local Government and Regional Development Minister recently announced that new energy efficiency provisions for housing would be incorporated into the Building Code of Australia and adopted in Western Australia on July 1, 2003.

4.9 Preserving Cultural Heritage, Landscapes and creating 'Sense of Place'

- *Encourage local government's implementation of heritage to be consistent, transparent and builds on precinct plans that establish guidelines for how to protect and enhance the essential character of their area whilst allowing for sympathetic infill and redevelopment.*
- *Develop a Built Environment Policy that focuses attention on Western Australia's architectural features that reflect our 'sense of place'.*

**These actions are generally supported.** However, the current confusion of the State's position on local heritage management and interpretation of the Heritage Act needs to be addressed before local governments can be expected to apply a consistent approach.

4.10 Building Sustainably

*Progressively incorporate the principles of the Sustainable Planning, Building and Construction Guide into relevant state government documents such as a Statement of Planning Policy, the Building Codes, the Design Codes, R-Codes and local town planning schemes.*

**This action is generally supported.** The draft Strategy does not include Sustainable Urban Design in the above list. The concept of Sustainable Urban Design is probably covered though a combination of other sections of the draft Strategy, but it would be useful to make specific reference to it here. Again, community understanding and support for the principles and recommendations of the Strategy are imperative if it is to be successfully implemented.

5. Sustainability and Community

5.1 Housing and Sustainability

- *Develop a Statement of Planning Policy on Public Housing, Community Housing and Affordable Private Housing with groups of local regional councils to ensure there is an appropriate distribution of all three housing tenures with guidelines and incentives, for example, density bonuses built into each local Town Planning Scheme.*
- *Evaluate under utilised government owned land close to services, for example passenger train stations and institutional sites for potential to develop as mixed use housing opportunities.*

**These actions are generally supported, but will require close scrutiny on the outcomes, prior to adoption.**

5.2 Sustaining Healthy Communities

*Facilitate partnerships with planning agencies to develop friendly and health promoting urban developments.*

**This action is generally supported.**

5.3 Education and Community Awareness for Sustainability

- *Develop and support partnerships on sustainability education with other sectors (such as local government) to maximise the delivery of sustainability education.*
- *Develop partnerships and provide ongoing support to community-based groups to assist in delivering school and community-based programs that engage children in activities that contribute to reducing car use for school trips, including the promotion of proficient bicycle use.*

**These actions are generally supported.**

#### 5.4 Sustainability through Culture and the Arts

*Improve the opportunities for children and young people to experience art and cultural activity including through better coordination of school visits and partnerships with arts and cultural organisations.*

**This action is generally supported.**

### 6. Sustainability and Business

#### 6.1 Eco-efficiency and Industrial Ecology

*Encourage the establishment of sustainable business clusters in WA, primarily based around resource recovery precincts and industrial parks.*

**This action is generally supported.**

#### 6.2 Industry Sustainability Covenants

*Develop a sustainability covenant program. Sustainability covenants will:*

- be non-binding (voluntary) documents entered into between government and progressive companies or industry associations;*
- be developed in partnership with local communities and relevant public interest organisations;*
- cover all aspects of a company or industry's economic, social and environmental performance and will commit the company or industry sector to creating net benefit in each of these areas.*

**These actions are generally supported.**

### 7. Implementation of the Strategy

The draft Strategy proposes various partnership arrangements with industry, business groups, local government and community groups. There is a need to recognise that these partnerships should be maintained well beyond the completion of the final Strategy.

The draft Strategy relies heavily on the statutory town planning system to facilitate the introduction of sustainability principles and initiatives. However, it does not make adequate reference on the resources, skills and capacity that may be required by some local authorities to implement these sustainability principles through the statutory planning system. There is a real opportunity for the State Government to share information and build capacity, in order to gain optimum efficiency throughout local government. Greater recognition of the importance of state policy on local planning should also be provided, particularly in view of the reluctance of the development and building industries to support any initiative which increases their costs, and the difficulties this presents to local governments seeking to implement such initiatives without state backing.

There needs to be an identification of suitable sustainability indicators and assessment criteria in order to provide clear assessment guidelines and benchmarks by which to review the success of the Strategy. The incorporation of these criteria into relevant policies is absolutely essential, especially to support the legal decision making process and planning authorities in their decision making capabilities.

There needs to be clear direction to local government by the State Government as to what is required to implement consistent, across the board sustainability initiatives within their local communities, and a common sustainability framework. There appears to be a reluctance for local authorities to enter into a sustainability programs where there is no standard framework, confusion over the aims of such programs and unpredicted outcomes.