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23 December 2002

The Director
Sustainability and Policy Unit
Department of Premier and Cabinet
15th Floor Governor Stirling Tower
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Dear Sir

**THE WESTERN AUSTRALIAN STATE SUSTAINABILITY STRATEGY
SUBMISSION FROM THE TOWN OF CAMBRIDGE**

The Draft Western Australian State Sustainability Strategy (Focus on the Future) was considered by the Council at its meeting held on 17 December 2002. In considering the Draft Strategy, the following comments are put forward for your consideration.

The draft State Sustainability Strategy is intended to provide an overarching framework for sustainability in Western Australia. The 42 priority areas identified throughout the strategy cover all echelons of society. The work of local government is relative to many of these priority areas.

Earlier this year, the Western Australian Planning Commission advertised three draft statements of planning policy (SPP's) concerning natural resource management, upon which the Town provided comment. These policies were:-

- *Environment and Natural Resources Policy (ENR Policy).*
- *State Coastal Planning Policy (Coastal Policy).*
- *Public Drinking Water Source Policy (PDWS Policy).*

The policies are particularly relevant, of course, to the State Sustainability Strategy and indeed the strategy makes repeated reference to the role of SPP's in implementing sustainability policy.

Much of what was said in the SPP's is now repeated in the sustainability strategy. In the circumstances, it is relevant to repeat Council's comments when considering these SPP's:

ENR Policy

Information/Data – in gaining best available information before making planning decisions, as outlined in the general policy measures, Local Government will be greatly assisted if the Department of Planning and Infrastructure (DPI) is able to identify and collate such data and where necessary, direct Local Government to the appropriate sources.

Densities – reference to residential densities is made under air quality and greenhouse gas emission policy measures. In established urban areas, the issue of residential densities is often a very contentious issue within the community. Whilst appreciating the intentions of better integration of land use and transport planning, it will need to be recognised that this will have to be balanced with the impact that any change in density might have on existing built form and sense of community.

Biodiversity – the protection of regionally significant vegetation for Perth and the protection of habitat corridors is acknowledged, however, such policy must also recognise individual land tenure, existing zonings and the potential for 'urban consolidation, within existing urban areas. The proposed establishment of a comprehensive reserve system must take account of the above factors and in regard to land tenure, local government land holdings should not be seen as public land, for inclusion in such a reserve system, without any thought of compensation or for that matter, who will continue to maintain the land.

Energy efficient building design – there is a considerable body of work that is being done in this area, but, this has come through various sources. The Australian Building Codes Board is preparing amendments to the Building Code of Australia regarding Energy Efficient Design, the Australian Greenhouse Office has printed material, the Housing Industry Association has run a recent series of seminars, and the draft Residential Planning Codes include some general provisions for the design for climate. As can be seen, the approach to energy efficient building design is somewhat fragmented.

This is an emerging area of development control in Australia and a more coordinated approach in WA is warranted.

Coastal Policy

The Town of Cambridge coastline is already protected by a wide Parks And Recreation Reserve under the Metropolitan Region Scheme. As such, the provisions of this draft Coastal Policy, insofar as it relates to new urban development, would not apply to the Town. With regard to the general management of the coastline and to the provision of public infrastructure, however, the provisions of the policy would be taken into account.

In this regard, again, the broad intent of the policy is supported. The objectives of the policy: protecting public access, sustainable use of the coast and accounting for natural coastal processes, are consistent with the Town's Coastal Plan.

Coastal setbacks - whilst recognising that there is a considerable amount of science which has gone into the formulae developed, they can only, at best, be an approximation. It is recognised that the policy identifies that there will be variations to the general case and possible exemptions are also listed. The application of this policy will require a sensible, evaluative approach, rather than relying purely on mathematics. Matters such as established public use, established infrastructure and a general cost/risk analysis for individual proposals must be taken into account.

Community Participation – in ensuring the opportunity for community to participate in coastal planning and management, it is very important that such participation is broadly based. Our coastline is widely used by a range of people for different purposes. It is important, that planning is able to respond (in a democratic way) to all of these interests and not be swayed by one particular interest group.

Urban Development on the Coast – the broad presumption in the policy that urban development should only occur in and around existing settlements seems somewhat subjective. Whilst not denying the demands for sustainable development practices, the coast is intrinsic to our way of life. People want to live near it and recreate there. This is not to say that the entire coastline must be developed, however, on the other hand, to ‘quarantine’ it from any further settlement is extreme.

Implementation

As overarching State Policy, the ENR, Coastal and PWDS Policies tend to express broad principles. Further, they form part of a suite of ‘sector issues’ that must be considered in planning, from a regional point of view. As mentioned earlier in this report, much will depend on how the state implements these policies, in balancing economic and social concerns with sustainable environmental management.

Of particular concern to local government is that decision making at the state level is accountable and expeditious. As one of the measures in the ENR Policy, ‘best available data’, is vitally important to informed and expedient decision making. Decisions based on general philosophy, or subservient to particular interests, will inevitably lead to adversarial situations and will ‘bog down’ the approvals process and continued involvement and commitment at the State Government level to assist Local Government in the management of the Coast.

In relation to the Town of Cambridge coastline, the Town would seek an open and communicative assessment process with the state, to enable it to effectively plan for the beach in a socially responsive, as well as an environmentally responsible manner.

In the application of these policies, as indeed with all State Planning Policies, there must be a genuine commitment by the State to engage with Local Government and the general community, and not merely enforce particular planning theory, from a distance.

Comment was sought on these draft policies by 29 March 2002. Since that time, we have had no response from DPI, either concerning our submission or on the progress of the adoption of the policies.

Further to the above, the following additional comment can be offered.

The strategy pins a great deal of importance on Future Perth as paving the way for a sustainable future for Perth. Certainly, the adoption of a strategic regional approach is vital in providing for good town planning. The progress of Future Perth, however, seems to have stalled over the past couple of years. If the principles espoused in the State’s Sustainability Strategy are to be advanced, then an updated strategic regional plan must be progressed. To do so, requires firstly, political commitment to allocate adequate resources to properly undertake such an exercise.

At a local level, the strategy promotes regional organisations of Councils as perhaps the best way of delivering sustainable planning outcomes. Further, Town Planning Schemes are identified as a primary instrument for the implementation of sustainability goals. Whilst acknowledging that regional organisations of Councils have had some considerable success with matters such as waste disposal and environmental management, the idea of extending such an operation to Town Planning Schemes has practical difficulties, from a legal point of view as well as social and political. Further, it is considered that the ability of the Town Planning Scheme to deliver some of the broader sustainability proposals (environmental, economic and social) is overestimated.

Essentially, a Town Planning Scheme is statutory instrument for the reserving and zoning of land and the control of subsequent development. It is but one component in the delivery of local government service. For example, the issue of social housing is much more than just an issue of zoning. There are significant social and economic influences which must be understood and accepted by the community, as expressed through their local Council.

If the intention is to amend the Town Planning and Development Act to require a Town Planning Scheme to incorporate much more, then its preparation will become infinitely more complex. Local governments are already struggling to maintain their existing schemes. Of the 153 Town Planning Schemes in WA, only 30% are current ie less than 5 years old. Nearly half are more than 10 years old. In the circumstances, the broadening of the function of the Town Planning Schemes could prove to be counter-productive. This is not to say, however, that schemes must not be complementary towards advancing the sustainability cause.

As mentioned earlier in this report, under the section 'sustainability and community', a glaring omission in the strategy would appear to be that of the role of sport in the community. In a social sense, sport, probably more than anything else, influences our sense of identity as a community. This is in addition to its contribution towards fostering an active, healthy (both mental and physical) community. This would be no more important than in rural Western Australia and would surely play an important part in arresting population decline in these communities, something that is strongly advocated in the strategy.

CONCLUSION:

Sustainability practice is certainly not new to local government. The exercise of establishing an overarching approach to sustainability for the whole state, however, is quite enormous. It is probably unlikely that this draft has captured absolutely all issues, although, it does provide the basis for what will no doubt remain an ongoing government commitment.

From a local government perspective, as proposed by the strategy, the role of WALGA is pivotal. The ability of WALGA to properly represent local government in this forum will depend on the success of communications between individual local governments and WALGA. Of critical significance will be the ability of local governments to adequately resource sustainability initiatives. This is in a climate of increasing responsibility being devolved to local government and a consequent growing financial burden being placed on it. If local government is to fully participate in the state strategy, then appropriate state assistance is essential.

Thank you for the opportunity to comment on the Draft Strategy. Should you have any queries on the Town's submission please contact Mr Ian Birch, Executive Manager Development and Environmental Services, on telephone 9347 6050.

Yours faithfully,

GRAHAM D PARTRIDGE
CHIEF EXECUTIVE OFFICER

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cc Chief Executive Officer,
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