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Sustainability Policy Unit  
Department of Premier and Cabinet  
197 St George's Tce  
Perth WA 6000

Dear Sir

### **Draft State Sustainability Strategy**

The Urban Development Institute of Australia (UDIA) is the peak industry body representing the urban development industry in Western Australia. It is in this capacity that we respond to the Draft State Sustainability Strategy (DSSS) and thank you for the opportunity to provide industry comment.

The land development industry is the nexus for creation of sustainable communities. UDIA has had a published policy on sustainability for more than 2 years and has a strong national role in promoting industry innovation and excellence. This includes a current sustainable development project being undertaken by our sister organisation in Queensland, as part of which develops strongly vied for selection of their projects as 'sustainable development demonstration projects'. Four projects were initially selected, and this has already been extended to six. This reflects an increasing adoption of the principles of sustainable development in the corporate mission statements and practices of our members.

UDIA welcomes a refocusing on sustainability as a true balance of economic, social and environmental factors. There is commonly an emphasis placed on environmental protection as the primary aim of 'sustainable development'. This does not reflect a balance of the three equally important components of which sustainability is comprised. The DSSS represents an excellent opportunity to review and achieve sustainability in Western Australia.

### **Comments on the DSSS**

UDIA's aim is provide constructive commentary on the DSSS and ensure that the strategy has a solid basis for future implementation prior to 'fleshing out' the strategy detail.

The DSSS is an all-encompassing and conceptual document. We therefore feel that it is most appropriate at this stage to provide comment on the key objectives of the strategy, and the strategy preparation.

There are a number of key items within the DSSS that UDIA supports. These include:

- Vision of renewal and revitalisation for urban Perth;

- Establishment of demonstration project to develop a model for a community-based revitalisation process;
- Increased public transport linkages and infrastructure;
- Reducing and managing waste; and
- Maintenance/ enhancement of cultural heritage and landscapes.

For the strategy to be most effective, a sense of ownership and endorsement is required from industry groups and the community. To achieve this, early and equitable participation of these groups and appropriate debate of the strategy's aims and objectives is imperative.

In this regard, UDIA supports the concept of an integrated approach to sustainability, however we have a number of concerns regarding the DSSS. These primarily relate to:

- The need for additional industry and public involvement in the preparation of the DSSS;
- Limited recognition of the wide range of sustainability initiatives already being undertaken by industry groups, including the land development industry, funded by industry;
- The complexity and cumbersome nature of the proposed governance model;
- The potential for strategy initiatives and implementation structure to further complicate the planning approvals process; and
- Insufficient co-ordination between the DSSS and other emerging sustainability initiatives and policies across all levels of government.

### **Industry and public involvement in the preparation of the DSSS**

As the DSSS is a broad strategy aimed at the entire community, it is pertinent to involve stakeholders at an early stage to ensure appropriate outcomes. Our view is that by engaging all industry groups whose willingness to adopt, and work with the goals and objectives of the DSSS is crucial for its successful implementation.

As the land development industry representatives body, UDIA requests that the state government establish specific industry working groups to provide the level of focus and detail required. The purpose of the working groups will be to develop a common sustainability framework and revisit the objectives of sustainable development prior to the further progression of the draft strategy.

## **Limited recognition and industry initiatives**

The concept of sustainable development is not new to the land development industry and commitment on behalf of individual development organisations to sustainable urban development is encouragingly strong. Evaluation of economic, social and environmental impacts of projects is considered to be standard practice by many UDIA members. The industry employs a range of experts that provide specialist knowledge in the areas of water quality, environmental and habitat protection and community consultation and development, which extend beyond statutory requirements.

UDIA is currently exploring a number of ways to formally recognise this individual effort as industry wide best practise to achieve recognition for the industry as a whole.

## **The complexity and cumbersome nature of the proposed governance model**

The implementation model proposed in Chapter 3 of the Draft Strategy, 'Governance' proposes the establishment of 3 separate Sustainability Assessment Units across 3 different government agencies. UDIA does not consider this the most preferable model for the following reasons:

- The 'triple bottom line' approach to sustainability inherently requires an integrated approach to sustainability assessment. One element of sustainability cannot be assessed in isolation to the other two elements.
- Developers currently liaise with a multitude of stakeholders including local government, state government departments, agencies and utilities. Additional requirements are likely to result in time delays, and cost increases for both the proponent and regulator.
- The model does not designate the ultimate arbiter.

UDIA asserts that any changes to the existing governance model should focus on the simplification and integration of the regulatory system, rather than the introduction of new dimensions.

## **Complexity of the Planning Approval Process, Increased Delays and Increased Resource Requirements**

It is imperative for all stakeholders that sustainability initiatives relating to land development are implemented in an integrated and efficient manner and do not further complicate the already complex planning approval process.

UDIA members experience significant delays in receiving planning approvals. Recent WAPC figures show a marked decrease in the number of applications determined within statutory time frames. The addition of any further application, assessment and referral requirements will compound this problem.

An independent study commissioned by UDIA in 2002, showed that, for every \$10,000 increase in the price of a \$150,000 house and land package, 24,000 Western Australian households fall below the affordability threshold. The introduction of new compulsory sustainability measures and assessment procedures, which increases the cost of housing to the buyer such that they are priced out of the market, would not meet the social benefit criteria of the sustainability package.

### **Co-ordination of Sustainability Initiatives**

UDIA is concerned that, while the DSSS attempts to be 'all-encompassing', state government agencies and departments continue to prepare disparate policies and statements that are not aligned to or may not be consistent with the DSSS.

UDIA strongly believe that any sustainability initiatives undertaken by Western Australian government departments or agencies and local government authorities should be consistent with and underpin the DSSS, particularly in regard to key issues such as 'Sustainability and Settlements' and 'Sustainability and Community'. We therefore request that the DSSS, its philosophy and main objectives are reviewed against and other departmental policy and statements to ensure a more concise, consistent, 'whole of government' position on the issues of sustainability.

### **Working together for Mutually Agreeable Outcomes**

We reiterate the commitment of UDIA to ensuring a more balanced sustainable future for Western Australia and highlight the need to achieve this through a mutually agreeable agenda for industry, community and government.

In this regard, UDIA would welcome the opportunity to work more widely and intensively with the government in finalising and implementing relevant sections of the DSSS. The benefits of sustainability derive to the whole of community. UDIA is therefore particularly concerned to ensure that costs of implementation need to be equitably distributed amongst the beneficiaries or mitigated by Commonwealth and State Government financial instruments, rather than focussed onto one industry sector.

We thank you again for the opportunity to comment in the Draft State Sustainability Strategy and look forward to your response.

Yours sincerely

**MARION FULKER**  
**Executive Director**