

SUMMARY AND RESPONSE TO PUBLIC SUBMISSIONS ON THE DRAFT STATE SUSTAINABILITY STRATEGY September 2003

Section Six - Sustainability and Settlements Introduction

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300297: City of Joondalup	37	Figure 5, Page 132. Extended metabolism model of human settlements: In this diagram mention is made of "cultural priorities" under the "dynamics of settlements" section. What does this mean? Does it relate to social priorities and "cultural" is used as a catchall term?	Yes. Cultural covers social and personal.
200302959: City of Fremantle	21	It appears that a confusing number and hierarchy of strategies and policies is emerging from government and the relationship between them all should be clarified and where possible, combined. For example, the relationships between the State Planning Strategy, Future Perth and Sustainability Strategy, state planning policies, R Codes etc. should be clearly clarified and defined.	Noted.
200302863: Property Council of Australia	16	First, the commercial property sector is a significant employer and consumer (or manager) of resources in WA. Yet the strategy at this stage makes little reference to the commercial property sector.	'Buildings' is intended to include commercial property.
200300089: Phil Thompson	18	"... managing growth".; "... redirect growth more sustainably.": A good example of how planners have also become good at bastardising 'sustainability'. If we are still talking about growth, then do not try and pretend that it is somehow being made sustainable through some type of 'management' or 'redirection'.	Why not? Growth of culture and heritage in Fremantle is good and helps sustainability. Growth is not always bad. Sustainability is about making growth achieve the values we want, including ecological.
	19	Page 132, 1 st para.: This rightly points out that for sustainability to be achieved, resource consumption (including land) must be reduced. Given this, how on earth can it be claimed that a city is being put on a path to sustainability if its strategic plan is still premised on significant ongoing population growth mainly occurring at the edge of the city, consuming adjacent native bushland and agricultural areas?	Population growth does not occur because it is planned. It is happening. Redirecting growth away from the urban fringe seems worthwhile.

Introduction *continued*

200301109: Mr Bruce Aulabaugh		Note: See original documents for pages 7 to 11	
200300364: Peter Wilmot and Jan Knight	7	Planning and Transportation: We were impressed with much of pp 141-142 and 158-159. The significance of sense of place in building commitment to local communities and hence to their sustainability are points well made. The importance of social equity as a key component in planning for and achieving sustainability is appropriately highlighted.	Noted.
200303074: WA Sustainable Industry Group (WASIG)	6, p.19	Re: vision, goals and priorities of sect. 6: There is however great concern that the 'people' dimension for achieving sustainable settlements does not get sufficient attention - the ecological footprint of settlements is a result of the physical infrastructure, the provision of services and the consumption and lifestyle choices of its people. The compartmentalised discussions on planning, transport, waste, water, energy, housing, etc. each have behavioural aspects, but do not convey the message that there is a need to rethink lifestyle choices and reorient consumption patterns.	That point is made in general in the global section and the conceptual section (see Resource Use and Sustainability Box). It is part of each section as well.
	2, p.20	The WA SIG would welcome more inclusive treatment of sustainable consumption as a key priority in the final State Sustainability Strategy. As recommended by the United Nations Environment Program, sustainable consumption can be addressed at four strategic levels: dematerialisation for efficient consumption; optimisation for different consumption, optimisation for conscious consumption and optimisation for appropriate consumption (see Table 5). Moreover, it can build on the 1999 additions on 'promotion of sustainable consumption' (section G), to the United Nations Guidelines for Consumer Protection.	See above. Education and Awareness is perhaps the main Action area of relevance.
200303266: Melville Conservation Group	5	On the presumption that consumption will decrease and a technological fix will be found, we may end up with a huge population, facing famine, disease and warfare. This is the fate of previous communities that could not read their landscape and unwittingly committed ecological suicide. Tinkering around with methods to ration water or shuffling households closer together in higher density housing does not solve the problems of population pressure. It results in making a lot more discomfort for a lot more people.	Population is addressed where it can be – at the global level.

Introduction *continued*

200303571: Michael Bach	2, p.1	<p>The first three sections of this chapter spell out the vision, objectives, actions underway, strategies and indicators. It would, however, be useful to develop a spatial development strategy based on sustainable development principles in this chapter of the Sustainability Strategy. This would be useful to plan for more sustainable patterns of urban development, pulling together the main strands in the first three sections of the chapter....</p> <p>His document discusses SECURING MORE SUSTAINABLE PATTERNS OF URBAN DEVELOPMENT (see document for more details)</p>	This will be considered as part of Greater Perth and 'Dialogue with the City.'
200303494: WA Planning Commission	3.29	<p>Whilst reducing resource consumption and our "ecological footprint" is recognised to be an important sustainability issue the key challenge is to coordinate the government's initiatives and projects across the issues referred to which include: water supply, waste, planning, freight and electricity (p132). <i>The Commission currently undertakes this coordinating role, with advice from the Department for Planning and Infrastructure, and input from key stakeholder agencies. In doing so it is guided by principles in the SPS. As in the examples above no reference is made to this role which is seen to be one for local government only:</i></p> <p>"..The Implementation Model suggests that regional councils be the main driver to ensure that general strategies are given a regional perspective in different regions an rural areas through detailed planning. This could then be reflected in statutory Statements of Planning Policy and local town planning schemes where appropriate..(p132)"</p>	This has been reflected in the final Strategy.

Managing Urban and Regional Growth

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200219471: Town of Cambridge	6	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.	Density is discussed in relation to building up centres; it is otherwise a local planning issue and an issue for Greater Perth.
	7	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.	Part of Bush Forever process.
200300363: Eastern Metropolitan Regional Council	56	Facilitating projects in country towns to capture "sense of place" (Action 4.1) and encouraging sustainable employment opportunities in outer metropolitan areas (Action 4.2) are generally supported and may also be relevant to areas in the Eastern Metropolitan Region such as the peri-urban Councils of Swan, Mundaring and Kalamunda.	Agreed.
	57	Urban growth is an important issue for Western Australia, particularly the Perth metropolitan area, and there needs to be a coordinated and consistent approach across State and Local Government planning objectives and processes (Actions 4.3 and 4.4).	Agreed.
	58	The progressive implementation of Bush Forever (Action 4.5) is strongly supported by Local Government, particularly as there is a perception that limited activity has occurred and there has been almost no communication of progress since the adoption of the report by the State Government. Significantly more funding is required to be provided by the State Government to implement this important initiative, particularly for Local Governments who are managing Bush Forever sites.	Noted.

Managing Urban and Regional Growth *continued*

200300363: Eastern Metropolitan Regional Council	59	Protecting designated groundwater mounds from incompatible developments and the use of water sensitive urban design to rehabilitate urban wetlands (Action 4.6) is supported. Western Australia pioneered water sensitive urban design, however lack of its application by Government agencies, developers and Local Governments has resulted in other Australian states progressing well ahead of this state in terms of implementation. Greater research and level of commitment from the State Government is required to ensure that water sensitive urban design principles are incorporated into future rehabilitation of urban wetlands, urban development, planning and urban renewal projects.	Agreed. Sustainability Scorecard will involve WSUD
200216374: David Karr, Interspatial Systems	17	By having a residential development tied into commercial and light industrial parks at the outset, public sentiment would accept this proposal (Ellenbrook) from the outset. Thus another Canning Vale would be prevented where you have residential, industrial and agricultural endeavours conflicting.	Noted.
200300261: City of Albany	6	The Strategy identifies that the planning system has potential to have a major impact on sustainability. Western Australia has an established planning system, which is administered by agencies with considerable experience in dealing with a range of development issues (in addition to the public). The inclusion of sustainable principles in the planning system will provide a significant opportunity through both statutory and strategic processes to influence the type and direction of development. The Strategy should acknowledge this potential and should focus on modifying current controls in a manner that assists in reaching sustainable outcomes.	Agreed. This is reflected in <i>Planning for sustainability</i> .
	7	The Strategy outlines that Statements of Planning Policy and other strategic documents have a strong role to play in ensuring that issues relating to sustainability are considered in planning processes. It is suggested that modifying the Model Scheme Text to contain a range of sustainable provisions may create further gains. As new schemes are created they will be required to take into account standard sustainability provisions which will then be applied on a local level.	Agreed. Sustainability scorecard will work through Model Scheme Text. NRM issues also need to be included.
	8	When developing sustainability criteria, and associated performance indicators, for the assessment of development it is important to ensure that the criteria enable the assessment of development from a balanced perspective. This is particularly important considering the focus of the existing system is on environmental protection and economic gain with little consideration being given to social implications.	Agreed. The Character of the State Sustainability Strategy is to bring these together, especially social aspects. See Conceptual chapter.

Managing Urban and Regional Growth *continued*

200300298: Information for Action	5	Perth has the worst urban development of any city in Australia and arguably in the Western world. It has massive urban sprawl. With a population of 1.25 million Perth is as long as Los Angeles, which has a population of about 13 million. Perth suburbs continue to devour wetland and bushland on its fringes. Many residents still use septic tanks and waste material from them is seeping into wetlands and rivers.	Urban sprawl is addressed in <i>Settlements</i> and will be further addressed in Greater Perth.
	6	Perth central business district is a glass graveyard at nights and on weekends. Other State capitals are far more people orientated. They have a vibrant and entertaining city centre with markets, cafes and areas where buskers, jugglers and magicians perform, areas for kids to play and places where people congregate.	It is changing - see 'The Art of Place Making' Box in Sustainability Urban Design.
	7	In the Netherlands, 70 percent of people go to work by bike. In Western Australia, we have the flat terrain and the perfect climate for cycling but we have adopted the car as our mode of personal travel. In WA last year there was a 1.6 percent increase in the number of licensed drivers (1.293 million drivers in total) and a 2.2 percent increase in the number of licensed vehicles (a 39, 000 vehicle increase in the past 12 months). The Dutch have chosen a very low polluting means of transport as a leading option and set up the facilities and laws to support cycling. In some Canadian and European cities, 25 percent of trips are on public transport. The Australian figure is 3-8 percent.	Good Data!
	8	Agriculture also impacts on the land, poisoning it with pesticides and nutrients, which with sewage, cause algal blooms to appear in the Swan and other rivers with increasing frequency.	The offset impacts of agriculture are considered in the final Strategy. See <i>Sustainable agriculture</i> .
200300348: City of Bunbury	8	State Government subsidisation of urban sprawl must also be turned around to create a system where developers pay for the true cost of development. An example is the proliferation of low-density subdivisions occurring along the southern freeway extension. These low density residential subdivisions that are up to 70 km from the Perth CBD have only been made saleable by the extension of the freeway. They result in considerable burden on transport infrastructure and they demonstrate some of the most unsustainable practices in terms of water use and vehicle dependency, yet as they have not had to contribute to the major transport infrastructure that has made them feasible, they are more economically attractive to developers and residents than more sustainable land development.	Agreed and noted in text.

Managing Urban and Regional Growth *continued*

200300348: City of Bunbury	10	Population issues and the rapid unsustainable expansion of low-density residential areas in the metropolitan area are not adequately addressed yet should be an issue that requires further mention in the Strategy. There is discussion on global population but nothing on local/state population. Neither does the strategy consider what is the most sustainable urban form. Population underpins most issues surrounding the concept of why we need sustainability. This is a significant issue and deserves further attention and subsequent action.	Population at state and local level cannot be stopped, only accommodated. Sustainable urban form issues are addressed in general but will be covered mostly by Greater Perth.
	11	Growth affects all sustainability principles and if growth management is not implemented effectively sustainability principles will continue to be lost. Again many of the strategies and actions are aimed at the metropolitan area. What about regional development plans and promotion from the state level regarding regional development? An extensive commitment to regional development by the State Government across all services and policies is required to promote regional development as a means of managing unsustainable growth in the Perth metropolitan area.	Greater Perth will address this. Regional Sustainability Strategies are meant to provide some of the internal dynamic for regional growth.
	12	The urban sprawl of Perth is the major issue affecting the sustainability of urban development in Western Australia. Perth is larger in area than European cities of up to 20 times its population. This is made worse by Perth being developed linearly along the coastal plain, a form that puts greater demands on transport and service infrastructure. Recommendations to reduce excessive sprawl and reverse State Government subsidisation of sprawl are needed in the strategy. Recommendations could include amending planning policies and performance criteria to ensure a high level of infill or consolidation of development occurs before further extension of the Perth metropolitan footprint.	This is reflected in the final Strategy. Bunbury could also adopt these principles.
200300368: City of Kalgoorlie- Boulder	23	The City of Kalgoorlie-Boulder presently has a regional planning strategy that will assist with the appropriate management of urban growth within the Cities environment.	Noted.
	24	The Sustainability Strategies need to be incorporated with the Region and Local Planning Strategies. It is noted that the implementation of the Country Development Program (Land Release Taskforce) rests predominantly with local government. The location of urban development is guided by the state, region and local strategies. The need for sustainable balance in major regional centres is considered important to prevent 'urban sprawl' and associated issues within the region.	Agreed.

Managing Urban and Regional Growth *continued*

200300886: Eddy Wajon	3	Actions 4.1—4.6: There is a need to target regional bushland conservation and to have Bush Forever-type schemes around other major towns in WA besides Perth. We should try to limit the population growth of Perth, and try to ring-fence Perth to limit the impacts of urbanisation.	Agreed.
200300357: The Water Corporation	45	One of the drivers for urban and rural decline or lack of development is when the cost of infrastructure provision is higher by a factor of one or more than the value of the improved land. There is a very real need to link development with natural resources so that the imports of resources and their costs such as power and water are minimised.	Agreed. An important insight for Greater Perth.
200300297: City of Joondalup	38	<i>Create a sustainable balance of employment, transport, housing choice and community development by managing urban and regional growth, including population change, through better urban structure. Page.135, Sustainability and Settlements.</i> How can government manage population change? Other aspects of what can be done about managing urban and regional growth, urban structures are detailed. What is meant by this statement?	'Population change' at a local level depends on urban policies.
200300140: The Wetlands Conservation Society	6	The draft Strategy does not have a section on environmental protection. Clearly the WA Environmental Protection Act is in urgent need of review to make it compatible with sustainability. There are also several features of the Act that do not work well at present, especially in regard to waste management and land use planning. Also the process for developing environmental protection policies is too cumbersome and appears to have broken down.	Environmental protection is part of every section, as is social advancement and economic prosperity. The EP Act is being revised.
	16	We also support Actions 4.5 and 4.6 although we note that more detail is needed on what will be done and in what timeframe.	More on this now in new section on <i>Sustainable urban design</i> .
200302862: Astrid Herlihy	1	There is little information in the WA State Sustainability Strategy Consultation Draft on the most important issue that drives all the others, unsustainable Population growth, that has an adverse impact on our social, economical, health and environmental well being.	Population is addressed. It is not necessarily seen as an 'adverse impact' in a declining wheatbelt town.
	3	It is criminally irresponsible for the State Government to try to cram more people into WA and the Howard Government should be lobbied to end immigration, as our natural birth rate is already unsustainable	WA has the lowest population density in the world.

Managing Urban and Regional Growth *continued*

200302959: City of Fremantle	22	The City of Fremantle supports the use of the Metropolitan Development Program to guide growth and that it be used as a <u>decision making tool</u> rather than documenting current and anticipated development. In addition, the role of the development industry is not incorporated. Strategy 4.4 should include the involvement of land developers about the timing of land release more so than local government. This raises the question of "who is leading and who is following?" with regard to land development.	Agreed. Needs to be considered more as part of Greater Perth and WAPC processes.
	23	The City of Fremantle has identified that there is a need for more resources to monitor the success or otherwise of documents and policies such as the Liveable Neighbourhoods Codes. In particular, the status of the Liveable Neighbourhoods Codes needs to be clarified to assist in its use.	Noted.
	24	The role of the state government in 'coordinating and developing' local planning strategies remains unclear. It seems that local government prepare local planning strategies and the state government approves them with no resources or assistance provided.	WAPC issue.
	25	The employment strategy is viewed as weak and needs further work to make it useable and effective.	State Sustainability Strategy is a context strategy, not an employment strategy as such.
	26	The target for managing urban and regional growth needs to be refined and expanded to encompass the breadth of this topic.	This should be considered as part of Greater Perth.
200302855: Planning Institute of Australia	51	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.	Agreed.
200303065: City of Gosnells	39	Priority is required for the <i>Greater Perth</i> project (formerly <i>Future Perth</i>) as urban growth vision and associated planning policies are seriously out of step with sustainability objectives. The <i>Bush Forever</i> strategy also requires attention, given its conflict in parts with developing sustainable urban form and the additional measures that are often sought by other agencies (i.e. the Waters & Rivers Commission) outside of this framework.	Agreed. See <i>Sustainable urban design</i> .

Managing Urban and Regional Growth *continued*

200300089: Phil Thompson	20	What exactly does 'redefining growth' mean? It is perhaps being more honest than it means to be in that it intends giving new meanings to words such that we can continue to have a growing city and pretend that this is still somehow sustainable.	Noted.
	21	Regarding Liveable Neighbourhoods, it should not be thought that sustainability will be achieved through making new urban developments of the Liveable Neighbourhoods type (see 1. above). Liveable Neighbourhoods developments which are actually 'on the ground' are not really all that different to 'conventional' urban developments.	They can be.
	22	Objective: see 15. above. What does 'population change' mean?	'Reversing decline' usually, eg Fremantle
	23	Indicators and targets: there should be indicators for the growth rate of urban areas (population and area): the lesser the rate (ideally zero) the better.	All indicators removed.
200301473: North Lakes Residents Association	19	In 2001 therefore, the issue becomes one of placing the environment central to the planning process. MRS planning must be subjected to stringent and rigorous environmental assessment processes, so as to redress the imbalance. Surviving environmental nodes, including those documents and stated in <i>Bush Forever (2000)</i> , must be considered not merely as a 'restraint to planing' but in fact as 'green spots' for planners to work around. Since community environmental standards have moved forward, it is no longer sufficient to merely draw an arching line on a map, and then legitimate gross vandalism of the environment though so called Town Lanning legislation.	See new section on <i>Sustainable urban design</i> .
200301109: Bruce Aulabaugh	7	The biggest challenge will be establishing some legitimate vision on a Perth Metro Area with 'reduced sprawl' and then 'redirecting growth' to the areas that are to cater for the desired or inevitable population and commercial/ industrial growth. The Future Perth project is identified as the vehicle for developing the required vision.	Agreed.
	9	Growth boundaries, minimum densities, land use mix, etc must be set out clearly and mechanisms must be identified to monitor and enforce these urban structuring elements.	Agreed. Greater Perth.

Managing Urban and Regional Growth *continued*

200301109: Bruce Aulabaugh	14	If new regulations are not in force, the likely outcome is that 'sustainable' projects will make progress - but only those that are not inconsistent with the current vested interests. The majority of projects that are undertaken will continue the existing pattern of sprawl unless very strong state government policies and plans are adopted that 'force' compliance. The idea of the current balance of incentives yielding a new outcome is naïve.	Noted. Change often occurs when it is seen as naïve however.
	15	Indicators and Targets: these should include resource consumption, habitat preservation, pollution, congestion, accessibility, equity, and affordability measures.	Removed.
200302880: City of Wanneroo	41	The development of the Future Perth strategy is an example of an initiative by Government that was examining a framework for progressing toward a more sustainable future for Perth. It is therefore very disappointing that this strategy has not been finalised.	This is now being progressed.
200302946: Landcorp	16	LandCorp feels the Liveable Neighbourhoods guidelines are a very useful framework for developers and planners. However, in the present form there is too much inflexibility in the Code for it to be universally useful as a statutory direction.	Noted. Review underway.
200302856 City of Stirling	18	<i>Encourage employment initiatives such as small business incubators for 'growing' job opportunities in outer metropolitan urban areas.</i> A strategy based on demographic need and a longer term strategy for employment and urban management could be supported.	Greater Perth could address this.

Managing Urban and Regional Growth *continued*

200301110: Christopher Williams	4 5 6 7 9 10	<p>We would like to develop a community of 30 to 60 households (see attached briefing notes). We seek suitable medium density land at reasonable cost in order to build a mix of equity and rental residences (offering a supportive community with social and economic diversity) in the metro area and within sustainability principles.</p> <p>A major difficulty is finding sufficient area of land for this number of households on which we will not be outbid by a property developer looking to develop a conventional (generally low density subdivision) in the belief that this is the means to maximise profit.</p> <p>The government, as a major owner of suitable land, is in a position to counter this tendency in private development by selectively making its own land sales subject to a sustainability audit at the proposal stage and sustainability conditions on the sale. This I believe, will not reduce the financial returns to government but will require some in practice (not merely in principle) support by government and its agencies.</p> <p>There appears to be significant residential land coming up for sale as a result of school amalgamations and, notwithstanding that they appear to me to be unsustainable, the resulting land freed up, with the right conditions, offers the opportunity for demonstration projects on sustainable communities all over the metro area.</p> <p>The Claremont proposal is at the stage of submissions for re-zoning by the owner (Ed Dept) to Claremont Town Council. The problem is the local community support for single residential lots and demolition of school (heritage?) has been translated via a focus group and consultant's report into Ed Dept proposal.</p> <p>This will produce 18 single residential lots (despite Town planning policy for higher densities within 1 km of stations, which this is) 20% public open space (despite 10% being the prescribed minimum) and a large area sold to extend backyards - presumably because it has no easy street access (which would make it ideal for community housing with peripheral vehicle spaces).</p> <p>Not a bad deal for the local residents, you might say, but it does nothing to further state govt's commitment to sustainable development, affordable housing or even maximising returns from sale of government land.</p>	Noted. This approach is addressed in <i>Sustainable housing</i> .
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Managing Urban and Regional Growth *continued*

200305563: Keith Jones	2	<p>Whilst it may be sustainably desirable to limit urban sprawl, it is nonetheless a fact that in this city a large section of the growing population will always seek to live close to the coast, and there are developers who will always be happy to cash in on this desire.</p> <p>It is not likely that any Government would dare to halt this expansion along the narrow coastal strip to the north and South of the city, which will quite conceivably eventually link to Bunbury and beyond Cervantes. If this is inevitable, then land use planning must include for provision of long range public transport corridors based on expansion of the electrified heavy rail system.</p>	Greater Perth.
200303088: Australian Association of Planning Consultants (AAPC)	2, par 6	The subdivision and land development process is given very little coverage, referring primarily to <i>Liveable Neighbourhoods</i> , which is still in trial and relates mainly to residential and town centre subdivision but not, to any degree, industrial or rural subdivision. The State Government's role as the only approval authority for subdivision in the State, via the Western Australian Planning Commission, is not referred to at all in the document.	The role of the WAPC is reflected in the final Strategy.
200218007: Bunbury Port Authority	2	<p>The sustainability strategy does not make any reference to the avoidance of duplication or making greater use of existing infrastructure. I make this comment in particular in relation to the regions where the opportunity may exist to defer expenditure in the capital cities through greater utilisation of regional assets.</p> <p>As you will be aware cities choke because more and more demand is placed on less available area. By sharing the load with regions development and quality of life WA citizens can be improved</p>	Noted. Freight Strategy does address this.

Managing Urban and Regional Growth *continued*

200303160: Goldfields Esperance Development Commission	Pg. 8	The government needs to undertake a major campaign to get those places that are being overused, such as Perth and the South-West into another part of the state – marketing and promoting the benefits of regional WA, and perhaps provide financial incentives. Some of the actions in this goal are very metrocentric.	Noted.
200301109: Mr Bruce Aulabaugh	P.2 par 2 and 3	<p>The idea of using the MDP with the help of Cooperative Agreements to control and coordinate growth to suit a new vision is logical because:</p> <ul style="list-style-type: none"> • The MDP is the only tool currently available for planning land release and infrastructure provision; and • The cooperation of local government is necessary for both funding of infrastructure and creating the common new vision for where growth is to occur and at what time. <p>However the use of these mechanisms to implement a vision which is at odds with many vested commercial and political interests is untested and at risk of serious compromise if not supported with new regulatory policies such as:</p> <ul style="list-style-type: none"> • SPP 5aa on urban growth limits; and • SPP 5aa on land use transport integration <p>These policies will not be developed or used if significant political support is not available at local council level, the proposed regional council level and at the state government level. In turn, such political support will not be forthcoming unless the need to 'redirect', 'control' and 'coordinate' land development is understood and agreed to at all levels.</p>	Noted. Greater Perth will consider this.
	P 2, par. 6	Indicators and Targets: these should include resource consumption, habitat preservation, pollution, congestion, accessibility, equity, and affordability measures.	Indicators and targets have been removed.

Managing Urban and Regional Growth *continued*

200303161: William (Bill) Grace	18	<p>Urban Growth: Despite the suggestion in the draft Strategy that the Metropolitan Development Programme is coordinating land supply, the reality is that Perth's urban development is still rather more influenced by developers with greenfield land holdings, than any coherent public policy.</p> <p>Recent developments heralded by the government as Greensmart suburbs are in reality minimalist with respect to sustainability improvements, and are (laudable) initiatives of the industry rather than the government.</p> <p>To the casual observer Future Perth appears to be moribund (the website has a heading entitled "Update – May 2000"). Recommendation 4.3 seems to be very weak on defining a process to settle on a strategic plan for the metropolitan area. It calls only on "... <i>a community debate</i> ..." rather than an outcome focussed strategy development.</p> <p>The final Strategy should require the WAPC to revitalise Future Perth with a view to the development of a Strategic Plan for Perth based on sustainability principles within a defined timetable.</p>	Noted. Greater Perth is now revitalised and will address these issues.
200300364: Peter Wilmot and Jan Knight	3	Section 4 focuses on the global population issue, with reference to the WA situation in Part 6. We looked in vain for a clear discussion of carrying capacity. The opening section, 'Managing Urban and Regional Growth' spoke of redirecting growth from greenfields to brownfields sites (in itself a good idea). The section was short on dealing with rapid urban expansion, instead referring to 'redefining' or 'redirecting' growth. The argument here essentially defers to the <i>Future Perth</i> planning process.	Carrying capacity is not used apart from discussion of the Perth Air Shed. Technology can affect carrying capacity and it may be difficult to apply to cities, e.g. desalinating the sea for Perth's water.
	4	The Sustainability Strategy should be much stronger on the issue of growth. The prevailing view within WA is still that population growth is good, bigger is better, and that (property) development is a right rather than a privilege. This view is driven by vested interests who will presumably powerfully impress their views in the production of <i>Future Perth</i> , and we will continue to get development which is environmentally damaging and resource intensive and pays no attention to sustainability issues.	Growth and population are addressed but are not seen as fundamental to Sustainability.
	5	The document is quiet on the broader issue of carrying capacity of our state. Population is a difficult issue as many in the community, because of their religious/cultural outlook, economic interests or plain ignorance of the nature of Australia, are not attracted to consider the carrying capacity of the state. However if it isn't addressed more clearly in this document, we can't see it happening elsewhere. This looks like an opportunity missed.	Growth and population are addressed but are not seen as fundamental to Sustainability.

Managing Urban and Regional Growth *continued*

200215541 John McBain	P 5 par. 6	The right of private landowners and developers to continually develop urban land. Perth is a city that has already exceeded its sustainable water usage capacity. In a country and state that requires a degree of decentralisation for the viability of its rural communities, it makes more sense to encourage people to live where there are adequate resources such as water, rather than to move the water to where there is already an excess of people. One way to do this would be to provide cheap residential/commercial land (to be developed using best available sustainability practices) where the water is. Eg In the state forest over the Yarragadee Aquifer. This would have other benefits such as providing cheap land in an area where there is a high demand that has pushed land prices beyond the affordability of the average person. It also has potential to form part of an innovative and alternative approach to the presently socially inequitable status of native title claims in that region.	Government is examining the Yarragadee option.
200217800: Michael Bell	32	How can country towns' irrigation remain sustainable if their dam water is siphoned off to Perth?	An integrated water supply system can be used for sustainability.
	33	Protection needed from the Water Authority grabbing water from where ever the like, for instance the Gngarra mound and the Wellington Dam! At Gngarra C.S.I.R.O. advise of very serious implications, what happened to the precautionary principle?	An integrated water supply system can be used for sustainability.
200301109: Mr Bruce Aulabaugh	P 1. par 5	'Managing Urban and Regional Growth' proposes to use traditional town planning type tools (e.g. structure plans, planning strategies, and planning policies) to establish the desired physical form for Perth. It also proposes to use the existing Metropolitan Development Program (MDP) and new Cooperative Agreements (between State and Local Government) to control and coordinate land development to fit the desired urban form and cost effective infrastructure provision.	Yes.
	P 1. par 8	The 'Future Perth' project must provide a definitive conclusion on the issue of urban sprawl and the optimum metropolitan form. If it is ambiguous or ambivalent, the current plans/policies/ processes will ensure that sprawl prevails into the future.	Agreed.

Managing Urban and Regional Growth *continued*

200301109: Mr Bruce Aulabaugh	P 1. par 9	Growth boundaries, minimum densities, land use mix, etc must be set out clearly and mechanisms must be identified to monitor and enforce these urban structuring elements. The traditional town planning system and processes have been very effective at ensuring a good supply of zoned and serviced land – but resulted in urban sprawl because they had no guiding principles, political checks or economic drivers directing them otherwise.	Agreed.
200303088: Australian Association of Planning Consultants (AAPC)	6, par 6	The State Planning Strategy should be a key feature of this part of the document, acknowledging and reiterating its purpose, objectives and content. The status of the two Strategies and their inter-relation will need to be clearly defined particularly in view of the strong reliance on statutory planning mechanisms and Regional Strategies for implementation of the Sustainability Strategy.	Changed to include State Planning Strategy.
	7, par 1	As referred to earlier, there is a need to undertake a critical examination of the issues related to the sustainability of country towns and regional centres, in particular the provision of services, employment, health and education.- Acknowledge the State Planning Strategy as a key implementation mechanism for the Strategy -Place greater emphasis on sustainability measures for country towns and regional centres	Noted.
200303092: Housing Industry Association (HIA)	3-6, p.13	Strategies: A key factor for the success of the strategies is the need to ensure that housing affordability is maintained/enhanced by an appropriate balance with environmental considerations. This is particularly relevant in the southern corridors of Perth given the high water table and the need to make best use of existing infrastructure such as the rail network. There are value-laden statements made throughout the draft report about 'urban sprawl'. Rather than a blanket judgement the strategy should examine the State's investment in major physical infrastructure (in particular rail), the historic settlement pattern for Perth as valid inputs into any suggestions regarding sustainable growth. The report for example, should focus on the self-sustainable nature of the corridors and the sub-regional centres and as in Liveable Neighbourhoods suggest a series of urban 'villages'. The use of WALIS as a tool in the sustainability agenda should be included under 4.4.	Noted. Greater Perth will deal with these issues in detail.

Managing Urban and Regional Growth *continued*

13164: Geoff Tohill	1	I contend that the State Development and Planning Policy is flawed and reinforces the pressures of social and environmental unsustainability in the metro area and Southwards along the Swan Coastal Plain. This is because it is based on traditional planning/ thinking about where populations will live and also based on market forces. It doesn't take into account the impact on social and environmental conditions which people are expected to live with. There is a self-fulfilling prophesy in the type of planning policy that puts infrastructure into particular areas so of course the populations will go there... Any policies that do not address the accumulation of our population into one small corner of such a vast state is drastically lacking in imagination and foresight.	Infrastructure and planning issues need to address growth management – the State Sustainability Strategy raised this for the first time.
200309737: Office for Women	10	The State Sustainability Strategy currently holds a number of opportunities for the inclusion of gender equity principles. They include ensuring that: . the impact of urban planning and design of settlements on women (eg. use of public transport, safety issues, schools) is addressed	The final Strategy reflects gender issues.
200303416: Quinns Rocks	5, p.2	A growth management strategy should be prepared for metropolitan Perth. It should outline actions to stop urban sprawl e.g. urban growth boundary and full-cost headworks charges, and ensure more integrated development where it will do the most good, e.g. local population targets, precinct planning. The draft strategy says the Future Path study will promote debate about urban growth (action 4.3), but to date there has been little sign that alternatives to sprawl are being seriously considered. An important corollary of limiting urban growth is reviving established suburbs and country centres to, where appropriate, accommodate population growth (e.g. actions 4.7 – 4.12).	Greater Perth will address these issues.
	7, p. 2	The draft strategy proposes progressive implementation of Bush Forever (proposed action 4.5). Protecting urban bushland is important, unfortunately Bush Forever includes too many compromises and failed to address so called 'locally significant' bushland.	Noted.
200302729: Shire of Serpentine-Jarrahdale	5, pg. 13	The key sustainability issues for declining areas and areas requiring population growth is employment and in particular youth employment. This will help retain youth within regions who can build a thriving community.	Noted.

Managing Urban and Regional Growth *continued*

200302729: Shire of Serpentine- Jarrahdale	6, pg. 14	<i>Proposed Actions</i> There needs to be a strategy developed for the Perth metropolitan region that explores that carrying capacity (ecological) of Perth and where the extent of urban sprawl should be. From this legislation and policies can restrict urban development to within Perth's carrying capacity and all future growth can be accommodated within. This can be achieved through strategic consolidations around urban centres and transport nodes which more sustainably uses infrastructure and reduces car usage.	Should be part of Greater Perth.
	7, pg. 14	<i>Indicators and Targets</i> Employment in regional areas	Removed.
200303738: Royal Australian Institute of Architects	11, pg. 3	<ul style="list-style-type: none"> • The RAIA believes that to change the way planning and development happens in Australia, requires a paradigm shift in accounting, management and taxation • Tax disincentives for environmentally informed planning must be removed • Tax protection of land use types is needed as opposed to current tax pressures (proximity land valuation raises land taxes) which effectively force peri-urban lands to be subdivided and developed, regardless of their optimum land use/classification {such as prime agricultural, conservation land, networks of ecological corridors linking habitats ("econets"), scenic and recreation reserves} • A system of land use type classification needs to be developed to counter the value (tax) pressure to develop lands on the basis of their being near land already developed or identified for future development. • Land speculators are no more entitled to capital gains/profit than any other form of speculation that does not turn out the way a speculator had hoped. Planning changing land use may cause a speculator's windfall but might just as well cause losses. Compensation should not automatically be payable. • Heritage preservation needs incentives and public support in recognition of the "public good" obtained • All costs of development should be assessed and budgeted – at present private land developers are effectively subsidised by the community in terms of Government support and infrastructure 	<p>Taxation is mostly an issue for the Commonwealth Government.</p> <p>Agreed. Added Box on this.</p>
200302774: Waste Management Association	p.11	Sustainable waste management associated with urban centres needs to be considered in the planning processes. This includes facilitating composting as one of the principal mechanisms for processing domestic waste materials, particularly with respect to maintaining strategic agricultural areas as markets for these processed materials.	Agreed.

Managing Urban and Regional Growth *continued*

200303590: WA Collaboration	Rec. 42	Managing urban growth The State Government should establish urban growth boundaries to contain urban sprawl and focus urban development in areas that have been agreed upon in participatory planning processes. This program must be accompanied with an appropriate affordable housing strategy and a Regionalisation Policy which maximises opportunities for future sustainable urban development outside the Perth Metropolitan area.	Agreed. This is the thrust of 'Managing Urban and Regional Growth.'
200219116: Wheatbelt Development Commission	19	In strategy 4.4, the requirement to match land supply to the cost efficient provision of infrastructure may have a detrimental effect on land development in the Wheatbelt region. In the majority of cases, cost efficient provision of infrastructure does not occur, as it needs to be subsidised to allow land developments to take place.	Noted.
200300358: F. Schnattler	60	Vision multi-bottom line concepts and systems that optimise the location of urban settlements by matching land supply to multi-bottom-line objectives and processes in relation to transport and other basic infrastructure like airports, business parks, fire stations, heavy industry, hospitals, parks, power stations, schools, universities, et cetera.	This is the approach that is undertaken through town planning.
		Progressively implement Bush Forever by creating 10,000 square kilometres of National Parks around the Perth Metropolitan area.	See new section <i>Sustainable urban design</i> .

Revitalising Declining Centres and Suburbs

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	60	Proposed actions to 'revive' the suburbs and consult with Local Government (Actions 4.7, 4.8, 4.9, 4.9 and 4.10) are all strongly supported. This is an important issue for many areas in the Eastern Metropolitan Region, which would benefit through urban renewal projects. State Government intervention and investment into Local Government through ongoing revitalisation programs (Action 4.10), is also highly commended. This also has important social, economic and environmental implications for Local Government and its communities and provides a good opportunity to raise awareness of sustainability principles within the business and community sectors.	Noted
200219280: City of Swan	34	Revitalising declining centres and suburbs. It is worth noting that while 'Reviving the suburbs' trial is a good idea, such projects are limited in number because of lack of finance or funds to progress such projects. Perhaps as a demonstration project, the draft consultation State Sustainability Strategy Report should carry out an evaluation of the Eastern Horizons Project and recommend what measures need to be put in place to achieve a more sustainable suburb?	Noted
	35	Page 138 makes reference to a model for measuring the relative performance of suburbs against design and sustainability indicators. This model needs to be included in the report and the design and sustainable indicators spelt out in detail. How do you measure a suburb in a state of decline?	This is discussed in <i>Sustainable urban design</i> but needs much more work, e.g. through for example the work happening in Gosnells.
200300368: City of Kalgoorlie- Boulder	25	Support for the decentralising of industry and commerce will assist in the revitalisation of a number of smaller communities. Development of E-commerce hubs (21 st Century infrastructure) in regional areas, to assist in the revitalisation of communities should be fully supported by state government.	Noted
	26	The 'Reviving the Suburbs' will require a commitment from local governments as many of the identified initiatives will involve financial contributions from local government and therefore local government needs to contribute to the development of the initiative and the Community Code for Revitalisation. These initiatives should integrate with Liveable Neighbourhoods Code and take into consideration the heritage value of the older inner suburbs.	Noted.
200300306: Western Australian Bicycle Committee	7	Proposed Action 4.16 should be amended to read: "Enhance the new and existing suburban railways by providing for the physical integration of cycle paths as part of and near these facilities and..."	Noted.

Revitalising Declining Centres and Suburbs *continued*

200302959: City of Fremantle	27	A definition of 'declining' centres and suburbs required and there is likely to be a difference in opinion between what urban professionals and residents/property owners may see as decline. There is also a need to ensure community change is not necessarily seen as a decline as suburbs must accommodate change particularly in household structure.	Noted
	28	It is expected that community involvement in determining 'declining' suburbs will be required. Issues and problems must be clearly identified and the bottom up involvement is considered equally important as any top down intervention.	Noted
	29	Scope and role of 'Community Code for Revitalisation' must be clarified to ensure that there is no conflict with policies or plans already developed by middle suburbs. If developed, the Community Code for Revitalisation must encompass industrial and commercial areas.	Noted
	30	Proposed action 4.11 will require careful community input. Previous efforts have not been successful, as many communities remain opposed to higher density development. Protection of 'family capable housing' and 'amenities' such as backyards have been debated in Fremantle and it is still a contentious issue. In addition, further research into the energy efficiencies gained from higher density developments is required.	Noted. Further action item.
	31	It would be preferred that a regional assessment and approach to residential density levels is undertaken rather than limiting it to a local government boundary.	Best of regional approach outlined
	32	Proposed action 4.12 should include "A network of case studies be compiled from across Perth (and elsewhere if 'culturally' relevant). Audits of completed programs or actions should be undertaken and compiled." Communities are now expecting action rather than the formulation of more strategies and reports which have a tendency to sit on shelves.	This is the whole approach of the State Sustainability Strategy
200302855: Planning Institute of Australia	52	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.	Noted.
	27	... the proposed actions do not include strategies that look at the current disincentives to investment, and in particular the deterrent effect of stamp duties and land tax increases. The growth of the economy that drives urban revitalisation and jobs growth is underpinned by investment, which is significantly affected by tax structures. In short, a thorough analysis would countenance tax and other strategies that would encourage and attract investment for jobs and urban growth.	Noted.

Revitalising Declining Centres and Suburbs *continued*

200301109: Bruce Aulabaugh	18	<p>Although Perth has had 'revitalisation' projects such as the East Perth Redevelopment, Subiaco Redevelopment, and various Homeswest housing upgrades, the inclusion of this element suggests that:</p> <ul style="list-style-type: none"> • Perth is maturing and the mass of existing development is significant and some of it demands urgent attention; and • A role exists for the state planning agencies throughout the whole of the 'development life cycle' whereas currently, local government has been left with the task but not necessarily the resources or power to maintain and support viable centres and suburbs. 	Noted
	19	The use of Enquiry by Design workshops and the establishment of Redevelopment Authorities for key centres has been tried and tested and offer a viable implementation mechanism. Funding will remain a key factor to these projects. An Integrated Funding Framework could help redirect 'road construction' money to fund the public transport facilities that are often crucial to these 'revitalisation projects'	Agreed
	21	<p>The ability to significantly intensify development will require a new attitude toward higher density living and some assurance that property values and neighbourhood amenity are not going to be sacrificed. If a new attitude is not forthcoming from within the community then local councils will not be able to adopt the required local planning strategies, will not adopt the required land use zoning/rezoning and will not approve development applications of higher density projects.</p> <p>Before the Perth population accepts urban consolidation, a strong case needs to be made on the grounds of sustainability. It is likely that a significant consultation/ education/ promotional campaign will be required to effectively engage the public in a 'paradigm shift'.</p>	This could be addressed through Greater Perth.
	23	Indicators and Targets: These should include accessibility measures (and non-transport measures such as employment/ income, education/ social services coverage, etc).	Removed
200302856: City of Stirling	19	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.	Agreed

Revitalising Declining Centres and Suburbs *continued*

200302856: City of Stirling	20	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 fulfill the same role as the "Liveable Neighbourhoods" design guidelines, but for established residential areas.	Agreed
200219280: City of Swan	40	It is worth noting that while 'Reviving the suburbs' trial is a good idea, such projects are limited in number because of lack of finance or funds to progress such projects. Perhaps as a demonstration project, the draft consultation State Sustainability Strategy Report should carry out an evaluation of the Eastern Horizons Project and recommend what measures need to be put in place to achieve a more sustainable suburb?	Noted
	41	Page 138 makes reference to a model for measuring the relative performance of suburbs against design and sustainability indicators. This model needs to be included in the report and the design and sustainable indicators spelt out in detail. How do you measure a suburb in a state of decline?	A Sustainability Scorecard will be developed
200300368: City of Kalgoorlie- Boulder	31	Support for the decentralising of industry and commerce will assist in the revitalisation of a number of smaller communities. Development of E-commerce hubs (21 st Century infrastructure) in regional areas, to assist in the revitalisation of communities should be fully supported by state government	Noted
	32	The 'Reviving the Suburbs' will require a commitment from local governments as many of the identified initiatives will involve financial contributions from local government and therefore local government needs to contribute to the development of the initiative and the Community Code for Revitalisation. These initiatives should integrate with Liveable Neighbourhoods Code and take into consideration the heritage value of the older inner suburbs.	Agreed
200319175: City of Armadale	22	The City of Armadale has initiated the Neighbourhood Improvement Project (NIP) aimed at revitalising suburbs.	Noted
200301109: Bruce Aulabaugh	P3 par 2	The use of Enquiry by Design workshops and the establishment of Redevelopment Authorities for key centres has been tried and tested and offer a viable implementation mechanism. Funding will remain a key factor to these projects. An Integrated Funding Framework could help redirect 'road construction' money to fund the public transport facilities that are often crucial to these 'revitalisation projects'.	Agreed

Revitalising Declining Centres and Suburbs *continued*

200301109: Bruce Aulabaugh	P3 par 3	The draft strategy suggests that new or improved infrastructure and service provision could be linked to key sustainability features such as 'higher density development and urban consolidation'. The acceptance of higher density development is a sensitive issue in the Perth context and local councils have taken considerable 'heat' over medium and high density zoning of in-fill areas or rezoning of existing low density areas to medium or high density.	Noted
	P3 par 5	Before the Perth population accepts urban consolidation, a strong case needs to be made on the grounds of sustainability. It is likely that a significant consultation/ education/ promotional campaign will be required to effectively engage the public in a 'paradigm shift'. This applies equally to the 'Managing Growth' strategy element discussed above.	Agreed
	P 3 par 6	Indicators and Targets: These should include accessibility measures (and non-transport measures such as employment/ income, education/ social services coverage, etc).	Removed
200215541: John McBain	P 13 par. 2	<i>Urban development:</i> The draft stipulates that infill sewerage programs are a pre-requisite for further land development. Our methods of household waste management are based on out-moded technology...; the flushing toilet, leach drains and deep sewerage all combine to turn valuable resources into waste and health problems....The process enables people to ignore their own waste, while using freshwater to turn it into a large environmental and health problem... <i>in short, the perfect example of wasted resources and unsustainability.</i>	Noted.
200303088: Australian Association of Planning Consultants (AAPC)	3, par 1	Further work is needed on revitalising rural settlements, country towns and regional centres. Many of the these areas are faced with considerable sustainability challenges including economic, environmental and social equity issues, many of which are complex and problematic and require commitment from all levels of government. A specific section devoted to this issue is warranted in the document, at least to the extent attributed to "Revitalising the Suburbs."	Noted. This is mostly a regional development issue but the proposed Regional Sustainability Strategies could assist with this process.
200303224: Minister McHale	5	Cultural planning should be embedded in town planning to achieve a balanced approach to the development of new and revitalized communities.	Agreed

Revitalising Declining Centres and Suburbs *continued*

200302729: Shire of Serpentine- Jarrahdale	8, pg. 13	The proposed actions need to have long term focus and funding ensured to allow for urban renewal to occur across the metropolitan region. Engaging local Governments during the preparation of guidelines and other initiatives will be key to the success of the programs.	Agreed
200300358: F. Schnattler	61	Vision and realise suburbs that provide employment and 'sense of place and wealth'.	Agreed.
	61	In consultation with local government, do not progress towards higher density residential development. Instead of, vision and realise BEvolutionary employment and 'sense of place and wealth' opportunities with commitments to local urban consolidation.	Noted.

Integrating Land Use and Balanced Transport

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200219471: Town of Cambridge	6	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.	This should be considered as part of Greater Perth.
200300363: Eastern Metropolitan Regional Council	61	The move towards adopting the framework used in 'Liveable Neighbourhoods' (Action 4.13) is supported. This action needs to have a greater level of commitment and a statutory basis to ensure the active adoption of Liveable Neighbourhood principles in all future development projects.	Noted
	62	Improving pedestrian access (Action 4.14) and bicycle use (Action 4.15) and enhancing rail transport and feeder systems (Action 4.16) and other research tasks (Actions 4.17 and 4.18) are supported as initiatives to reduce car dependency. Developing programs to increase mixed-use development (Action 4.19) will assist in taking advantage of existing transport infrastructure and encourage liveable neighbourhoods.	Noted
	63	Flexibility in residential zoning to allow for small business in residential areas (Action 4.20) is supported and is an important issue for Local Government in addressing sustainability in the business sector. Careful consideration however, needs to be given to the administration and implementation of this issue to ensure compatibility with neighbouring residents.	Noted
	64	The review of the Metropolitan Transport Strategy to double the rail system and facilitate other upgrades (Action 4.22) is supported by the EMRC and should be targeted toward the Eastern Metropolitan Region that is lacking in these facilities, compared to other regions.	Agreed

Integrating Land Use and Balanced Transport *continued*

200300138: Tara Shah	1	Could Perth revitalise its ferries networks in the same way Sydney has? The jetties all seem to still exist, car-parking would not be difficult to create for cars which were not within walking distance, and a couple of loop circuits up and down the swan would surely not be hard? It's possible people in Perth do not work in the CBD to the same extent they do in Sydney. If it was possible though, obviously it would ease traffic and its associated costs, promote public transport, and perhaps also be a charming, soothing way to travel.	Car parking is very difficult in these riverside suburbs. Experiments continue.
200216374: David Karr, Interspatial systems	19	Another factor that needs to be considered for residential developments,(as well as commercial and industrial) is the need for a town planning scheme to include a GRID system of main roads. Perth is littered with dead ends, and a very low usage of public transport, due to the extremely bad layout of the city. (Checkout Ballajura with NO straight main roads).	Liveable Neighbourhoods includes this.
200300261: City of Albany	9	There is an identifiable push to more sustainable outcomes as is illustrated in the new energy efficient controls that are to be adopted for the Building Codes on the 1 st July 2003 and the new Residential Design Codes (which place increased emphasis on sustainability through incorporating provisions that influence built form and the way that buildings and hence people relate to each other). The Strategy should build upon the foundation that has been created by these documents.	Agreed
200219280: City of Swan	36	The vision, objectives, proposed actions have merit and some ideas such as increasing new dwellings within one kilometre of a rail station are being investigated by the Midland Redevelopment Authority.	Noted
200300140: Wetlands Conservation Council	17	We strongly support 4.25 and recommend in addition that the Main Roads Department should be amalgamated with DPI immediately. As long as MRWA is independent of DPI we will not have integrated transport planning in WA. Why do road users need a separate department to deal with?	Road planning in now integrated with DPI.
200219175: City of Armadale	32	Proposed TPS No 4 indicates that Home Business is a discretionary use (subject to advertising) in Residential zones.	Noted
	34	It is likely that the Armadale City Concept Plan will allow for such flexibility. In addition generally flexibility regarding parking is provided through the R-Codes, although Council would need to be cautious in approving development without standard parking provision.	Noted

Integrating Land Use and Balanced Transport *continued*

200301111: Subiaco Bicycle User's Group	5	Education of the community in terms of cycling as a significant transport alternative needs to be emphasised in the document. A Proposed Action that advocates and promotes cycling as a sustainable transport choice, possibly under the Education aspect of Sustainability and the Community, is needed.	This is mentioned several times in the final Strategy. Strong advocacy documents exist in government.
	8	The TravelSmart initiative was not mentioned directly in the document, yet significant improvements in use of walking, cycling and public transport have been obtained. The severe cut in its funding, of about 75%, in the 2002 budget is a concern.	TravelSmart is now included in the final Strategy.
	12	Analysis of potential bicycle projects should incorporate triple bottom line spillover benefits such as health and exercise, 'community' development, lifestyle and 'sense of place', reduced noise pollution and air pollution, and reduced fuel use. Further, projects should be assessed against the broad areas of government policy, including, but not limited to health, greenhouse, air quality, safety, and increasing cycling, walking and use of public transport. For example, just within the health area, increased cycling can contribute to reduced air pollution, noise, road trauma, and reduced lifestyle-induced illnesses associated with over use of cars; this is especially pertinent with health resources over stretched – 'a penny of prevention is worth a pound of cure'.	Walking and biking are mentioned as agents of these outcomes.
	13	Bicycle infrastructure and planning needs a dedicated body to oversee it.	Noted
200300306: Western Australian Bicycle Committee	8	Proposed Action 4.24 should be amended to include a reference to the inclusion of bicycles in available salary packaging arrangements.	This has been added.
	10	Proposed Action 4.18 should be expanded to include parking for all modes (i.e. including cycling) as part of planning suburban centres, and to expand the new Residential Design codes to require the provision bike parking in development approvals.	This has been addressed.
	11	Wherever possible, references to public transport such as in Proposed Action 4.21 needs also to include a reference to cycling/cycling facilities.	This has been addressed.
	12	In Proposed Action 4.22, the need for the development of and agreement on suitable transport mode share targets needs to be noted.	This is implied by 'Review'.

Integrating Land Use and Balanced Transport *continued*

200302959: City of Fremantle	33	There is still a need to resolve the outstanding regional transport issues in Fremantle. Substantial resources need to be applied for the proposed actions in this section and they should be prioritized. Many of the proposed actions need to be actioned at the local government level and it is expected that resources and assistance from the state government is offered.	Further work occurring.
	34	There is also a required commitment across government to documents such as the Metropolitan Transport Strategy.	Noted.
	35	More ambitious targets need to be set for this section to ensure the proposed actions are actively and effectively pursued.	The actions contained in this section are ambitious.
200303065: City of Gosnells	43	These actions are strongly supported, however models of application need to be developed, particularly within a suburban context. There is also a need for certainty in transport provision if planning systems are to be applied, however it is acknowledged that this may be addressed in part through action 4.25.	Noted
200302863: Property Council of Australia	21	The draft strategy proposes to " <i>Research parking demand at suburban centres</i> " (at 4.18). It is not explained why this is necessary, what should be researched, nor are possible consequences detailed. Our concern is that the agenda behind this recommendation is not clear. A fear is that these policies could be used to introduce levies along similar lines to the Perth Parking Licence Tax, which has been exploited for revenue raising purposes to the detriment of property owners and tenant businesses in Perth.	Noted.
	21	Another concern is that inflexible policies could be introduced that do not account for the needs of particular tenant types in different commercial properties. Thus, we support another recommendation on parking, to " <i>Encourage flexibility in local government parking policy in areas where there is good public transport</i> " (at 4.21). This could significantly reduce development costs, reduce waste of resources with barren car parking areas, and yet still allow economically viable development to occur.	Noted.
200300089: Phil Thompson	24	4.20: Regarding locating of new small businesses and 'corner shop' retail facilities in existing suburban communities: the former is generally facilitated through 'home business' and 'home occupation' provisions in local Schemes. The matter of corner stores needs to be provided for in the initial planning and development of the community.	Noted

Integrating Land Use and Balanced Transport *continued*

200301109: Bruce Aulabaugh	26	By providing better public transport, cycle and walking facilities and by educating the public about travel choices, a shift in travel behaviour is achievable. A key question is whether the state will adequately follow through on: Transport funding reform to allow non-auto modes the necessary funding priority to overcome the current imbalance in the transport system. Road projects must be funded in competition with 'green mode project' and justified using a 'balanced' assessment process that gives weight to the social and environmental impacts of increased automobile use.	This is being addressed through the Planning and Infrastructure Portfolio.
	28	A key question is whether the state will adequately follow through on: Cost effective and 'anti-sprawl' public transport improvements – although there is little doubt about the long term need for the Mandurah Rail Line, there are legitimate questions about the short-medium term patronage forecasts and the final price we will pay for the facility. If Western Australia can afford it then great, otherwise bus service probably should have been used until development progressed further in the SW corridor.	Noted.
	30	Travel Smart (individualised marketing/ education programs on mode choice). This program had up a good head of steam and was gaining 'brand recognition'. The state government must prove that it is serious about Travel Smart by ensuring its funding and using its name in promotions/policies/strategies etc – this was not done in the Sustainability Strategy!	TravelSmart is now incorporated into the final State Sustainability Strategy.
	31	Perth Bicycle Network enhancements. The PBN is a great achievement but much more remains to be done. Funding is a critical element but so is finding opportunities outside of rail reserves and freeway reserves for high standard Principal Shared Path construction. Near Perth CBD, there are river foreshore paths and rail reserve and freeway reserve paths and at the coast there are 'coastal paths'. These all have bridges or underpasses or natural features that eliminate delays/ conflicts with automobiles.	Noted

Integrating Land Use and Balanced Transport *continued*

200301109: Bruce Aulabaugh	34	<p>Another key question is whether enough travel behaviour change is achieved through these 'carrots'. 'Sticks' are probably needed to finish the job and could include some or all of the following:</p> <ul style="list-style-type: none"> --Road pricing (congestion pricing); --Allocating existing and new road space to public transport; --Limiting the supply of car parking; --Increasing parking charges, --Increasing taxes on petrol, --Restricting company car schemes etc <p>The problem is that the state government (regardless of controlling political party) has consistently shown limited willingness or ability to consider any of the 'sticks'. This is because Perth has not been congested or polluted enough and these 'sticks' are politically risky and they rely on cooperation from local government and the development industry (e.g supply of parking and parking charges). In some cases the state government is even the guilty party (e.g company car schemes motivating excessive use of auto travel and providing no alternative 'green transport' scheme).</p>	Noted.
	39	Liveable Neighbourhoods deserves full STC support.	Agreed
	41	The creation of a 'district level design code' would be another step toward defining the elements of sustainable urban form. Obviously the issue of regional/ metropolitan urban form is as important if not more important but is probably outside the scope of the Urban Design Unit of DPI.	This could be addressed as part of the follow up to the Greater Perth process.
	42	Future Perth is the only identified mechanism in the draft sustainability strategy for establishing the desired vision for the optimum metropolitan urban form. STC must therefore focus adequate resources on tracking and participating in Future Perth project and ensuring that it provides clear definition on sustainable urban form at the metropolitan level.	Agreed
	44	Indicators and Targets: these should include density/ intensity of development at rail stations, freight tonne-kilometres, accessibility measures for inner, middle and outer residential areas, mode split targets, and total kilometres traveled by automobile.	All indicators and targets have been removed from the final Strategy.

Integrating Land Use and Balanced Transport *continued*

200302856: City of Stirling	22	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.	Agreed
200219280: City of Swan	42	The vision, objectives, proposed actions have merit and some ideas such as increasing new dwellings within one kilometre of a rail station are being investigated by the Midland Redevelopment Authority.	Noted
200300306: WA Bicycle Committee	6	In the Overview of Selected Strategies, the reference should be to the Perth Bicycle Network Plan. Also, the <i>TravelSmart</i> program is not mentioned and should be referred to in this summary, ie "...rail system, continuing and expanding the <i>TravelSmart</i> program and revamping and reconfirming the commitment to the implementation of the Perth Bicycle Network." The continuation and expansion of <i>TravelSmart</i> should also be identified as a Proposed Action in the relevant section.	TravelSmart is included in the final Strategy.
	7	Proposed Action 4.16 should be amended to read "Enhance the new and existing suburban railways by providing for the physical integration of cyclepaths as part of and near these facilities and..."	Agreed
	13	A new Proposal Action should note that the provision of funding for cycling facilities to meet these targets need to link to a whole of Government considerations as part of the State budget process. Cycling benefits are broader than can be funded by Department for Planning and Infrastructure and Main Roads; the preventative and sustainable health and environmental benefits to the community also need to be included in the budget equation.	Noted
	14	The requirement to provide suitable end of trip facilities, which provide for cyclist, also needs to be required under formal local and State Government Planning regulations.	Noted

Integrating Land Use and Balanced Transport *continued*

200300368: City of Kalgoorlie- Boulder	33	<p>The City of Kalgoorlie-Boulder has in place a bicycle plan, which is used for the planning and development of bicycle related projects and to encourage increased use of non-motorised transport. Economics of scale present difficulties in providing effective public transport facilities in regional centres compared with the Perth Metropolitan area.</p> <p>The provision of footpaths and bicycle paths and public transport is the responsibility of local government therefore to assist in the provision of footpaths on both sides of any road within a town boundary funding should be provided. The City's Town Planning Scheme has the provision to allow for convenience stores to locate in existing suburban communities but have found that these stores cannot compete with the 24 hour trading facilities and chain outlets. The proposal to cover noise and other environmental issued for all vehicles under the Australian Design Rules is seen as positive due to the impact on suburban amenity. The Integrated Funding Framework with intergraded landuse and transport planning are also seen as positive.</p>	Noted
200319175: City of Armadale	28	It should be noted that Liveable Neighbourhoods has been adopted in principal in the City's Local Planning Strategy.	Noted
	30	It should be noted that the City has a bike plan.	Noted
	32	Proposed TPS No 4 indicates that Home Business is a discretionary use (subject to advertising) in Residential Zones.	Noted
	34	It is likely that the Armadale City Concept Plan will allow for such flexibility. In addition generally flexibility regarding parking is provided through the R-Codes, although Council would need to be cautious in approving development without standard parking provision.	Noted

Integrating Land Use and Balanced Transport *continued*

200300305: Institution of Engineers	40	<p>There is a need for Government to promote greater use of the rail system. The Perth rail system is a highly effective means of transportation and is of a very high quality. The Government should investigate pricing strategies to increase patronage. There needs to be significant savings in cost and time for patrons to adopt the train system.</p> <p>In the eastern states, it is typical for multi-riders to be based on duration rather than the number of rides (for example, valid for one month rather than 40 rides). This promotes increased use of public transport as opposed to private vehicles. The current system of 40 rides in a multi-rider (say) allows the passenger to use their multirider when it best suites them. When the passenger is travelling to the city for instance, they make a decision about whether to use public transport or their private vehicle based on which of the two is more convenient. In a large number of situations, they will choose a private vehicle.</p> <p>However, if a passenger purchases a multirider that is valid for one month rather than 40 rides, they feel obliged to maximise the use of public transport within that month, to ensure they receive their money's worth. A trip that would otherwise have been taken by private vehicle may instead be taken by public transport. This is one means of increasing patronage on our rail system.</p>	Noted.
200305563: Keith Jones	1	The draft notes the current expansion of the suburban passenger rail system, to Clarkson and Mandurah, as a doubling of the overall existing system. However, all of this expansion is due for completion late in 2007. The draft does not specifically include for any further forward planning for rail development beyond this. The final strategy should include provision for investigation of new rail routes into the future, to at least ten and twenty year horizons, including planning for the installation of light rail services through existing suburbs and far beyond.	There is some discussion of expansion beyond this time.
200301109: Bruce Aulabaugh	P 3 par 10	Transport funding reform to allow non-auto modes the necessary funding priority to overcome the current imbalance in the transport system. Road projects must be funded in competition with 'green mode project' and justified using a 'balanced' assessment process that gives weight to the social and environmental impacts of increased automobile use.	This is being addressed through the Planning and Infrastructure Portfolio.

Integrating Land Use and Balanced Transport *continued*

200301109: Bruce Aulabaugh	P 4 par 2	Cost effective and 'anti-sprawl' public transport improvements – although there is little doubt about the long term need for the Mandurah Rail Line, there are legitimate questions about the short-medium term patronage forecasts and the final price we will pay for the facility. If Western Australia can afford it then great, otherwise bus service probably should have been used until development progressed further in the SW corridor.	Noted.
	P 4 par 3	Although controversial to suggest, it is possible that the rail line (and particularly the Kwinana Freeway) promotes early land development and unnecessary 'sprawl' in the SW corridor. It may be difficult to comprehend at first but there is a case to be made for limiting the extent of the corridors and limiting the transport system at their extremities.	The roads are already there, and land has already been zoned.
	P 4 par 4	Travel Smart (individualised marketing/ education programs on mode choice). This program had up a good head of steam and was gaining 'brand recognition'. The state government must prove that it is serious about Travel Smart by ensuring its funding and using its name in promotions/policies/strategies etc – this was not done in the Sustainability Strategy!;	TravelSmart is included in the final Strategy.
	P 4 par 6	Most of the bicycle path network suffers from the plague of frequent signalised road intersections that delay commuter cyclists and reduce the enjoyment and safety of recreational trips. Yes cars suffer from them also – but hey, why can't we give cyclists some preferential treatment	Noted
	P 4 par 8	Another key question is whether enough travel behaviour change is achieved through these 'carrots'. 'Sticks' are probably needed to finish the job and could include some or all of the following: <ul style="list-style-type: none"> • Road pricing (congestion pricing); • Allocating existing and new road space to public transport; • Limiting the supply of car parking; • Increasing parking charges, • Increasing taxes on petrol, Restricting company car schemes etc 	Noted.
	P5 par 1 and 2	If these 'sticks' are not used to limit automobile use, automobile travel will always increase to the limits allowed by the capacity of the road system – and pollution and congestion will get worse and worse...In some cases the state government is even the guilty party (e.g company car schemes motivating excessive use of auto travel and providing no alternative 'green transport' scheme).	Noted.

Integrating Land Use and Balanced Transport *continued*

200301109: Bruce Aulabaugh	P 5 par 5	<p>The draft sustainability strategy suggests extending or adding a separate code to cover 'District-level models'. The Urban Design Unit has been developing the key elements of a 'District-level model' at various charettes and workshops. It has not however documented the key structuring elements in the same detail as has been done for the smaller scale Liveable Neighbourhoods model which includes the following elements:</p> <ul style="list-style-type: none"> • Community design; • Movement network; • Lot layout; • Parkland; • Urban water management; and • Utilities. 	This could follow from the Greater Perth process.
	P 6 par 2	Indicators and Targets: these should include density/ intensity of development at rail stations, freight tonne-kilometres, accessibility measures for inner, middle and outer residential areas, mode split targets, and total kilometres traveled by automobile.	Removed
200303161: William (Bill) Grace	19	<p>Integrated Land Use and Balanced Transport: The draft Strategy states that Liveable Neighbourhoods is "<i>increasingly becoming the norm .. in joint venture state government projects.</i>" However a closer look would reveal that only certain components of Liveable Neighbourhoods has been adopted in the cited projects.</p> <p>The recommendation of the final Strategy needs to significantly strengthen the recommendation relating to Liveable Neighbourhoods. The (endless) review needs to be completed and the revised document mandated for all residential development projects.</p>	Agreed
200217800: Michael Bell	34 - 37	<p>Work to remove inequity of taxation.</p> <p>One thing that appears to be unbalanced is the situation that, it seems trucks are favored over rail for, all goods transport. This is partly because rail transport is said to be too costly, Of course it is not competitive when you consider the following;</p> <p>Most Rail transport costs are transparent and easily understood whereas; Road transport costs are blurred into public road costs, as the trucks are not paying for the cost of damage and wear and tear that they cause to the roads!! Another cost is in human life, ...Less trucks means less accidents.</p>	This is being addressed as part of the Freight Network Review.

Integrating Land Use and Balanced Transport *continued*

200303163: Brian Fleay	1, p.5	The draft SSS has extensive discussion on issues in which transport issues and car dependence play an important part. However, much of the SSS discussion is based on the internal transport and service needs of urban areas. Not enough attention is paid to their <i>absolute</i> dependence on <i>external</i> transport and service needs without which no city could survive.	Noted
200303264: Anthony Perl	4	I would like to stress the importance of using electric power to sustainably meet Western Australia's local and regional mobility needs, since this is the sole energy distribution infrastructure that is fully capable of enabling alternative energy sources (including renewable energy sources which could offer great promise in Western Australia) to be used in both freight and passenger transportation. Any energy source, from biofuels to hydrogen, could power an electric grid that would be used by "off the shelf" electric train, tramway, and trolley-bus technology. The same wires that power a trolley-bus network could also be used for local freight delivery by adapting trolley-trucks that already exist for mining applications. By building up its electric powered transportation capacity, Western Australia will both enhance energy efficiency while also gaining the ability to blend the widest possible range of energy sources to meet future mobility needs.	Noted
200302729: Shire of Serpentine- Jarrahdale	1, pg. 14	The vision states that transport and land use are to become so interconnected, in a sustainable city land use and transport would be interdependent one should be developed with the other. New Land development should be restricted to areas with adequate transport and transport should be developed where if the current or planned future population to sustain it.	This is discussed in the final State Sustainability Strategy.
	2, pg. 14	<i>Proposed Actions</i> *Development proposals must address public transport in their applications at both state and local levels. *Large scale development is not to occur where there is insufficient public transport. *Develop a long term public transport strategy that will ensure Perth achieves an extensive, particularly rail, network that is efficient, affordable and integrated with all transport modes and with urban centres.	This is reflected in the final Strategy.
	3, pg. 14	<i>Indicators and Targets</i> Number of train stations Number of bus services	Removed
200300358: F. Schnattler	62	As stated in Draft Goal. Just the last line should be phrased as shown below:... and end of trip facilities to encourage people of all ages to cycle and walk. Comment: Also incorporate in the plan infrastructure for hydrogen and solar-powered bicycles and mopeds.	Too early to plan for H ₂ infrastructure but conceptual planning is underway in DPI.

Integrating Land Use and Balanced Transport *continued*

200300358: F. Schnattler		Comment: Consider also to build a railway line between Stirling Station and Fremantle train station. Use for that purpose wherever possible the Stephenson Highway Reserves in the MRS!	Noted.
		In my opinion, providing an effective and efficient public transport infrastructure is a better use of funds available.	Agreed.
200303143: Royal Automobile Club of WA	Pg. 14	Generally support except for item 4.22 Any extension of the rail system, bus networks or any other part of the transport system should be based on the results of a full cost benefit analysis.	Cost benefit is done routinely. Options need to be considered from a sustainability perspective.
	Pg. 14	The request under item 4.23 requesting the extension of Australian Design Rules (ADR) to cover noise and environmental issues is not necessary as ADRs are currently under review and noise and other emissions are already addressed.	Noted.
	Pg. 14	Issues to do with waste and manufacture are Considered to be outside the scope of the design rules and clash with harmonisation.	Noted.
200303590: WA Collaboration	Rec. 45	Access to transport services In recognition of the critical importance of transport services, the State Government should review the full range of publicly funded transport services and policies, taking into account the role of each mode of transport in terms of sustainability, and the short and long term pricing policies. Key objectives of the review should be to achieve equitable access to transport services, promotion of sustainable transport use patterns and reduction of need for transport.	Noted. Pricing (mostly fuel tax) is a Federal issue. Review of Metropolitan Transport Strategy is proposed.

Managing Freight and Regional Transport

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	65	The range of action to increase the utilisation of the freight network (Actions 4.27 to 4.30) are supported, but will require consultation with Local Government to ensure that local factors are taken into account. The incorporation of sustainability techniques in contentious road and rail planning (Action 4.31) is supported and should achieve more balanced outcomes. The proposed creation of Regional Transport Plans (Action 4.33) with Regional Councils is supported, particularly as the EMRC is currently investigating major infrastructure projects requiring implementation in the region.	Agreed
200219280: City of Swan	37	More explanation needed of the multi criteria process.	Contact David Annandale at Murdoch University for more information on multi-criteria analysis processes.
200219175: City of Armadale	36	While the general issue of shifting freight to rail could be supported this matter warrants discussion as the focus to date has been in and around Fremantle. The implications to the City of Armadale would be significant.	Agreed
200302959: City of Fremantle	36	Demand management (page 143) is a key issue that should form the basis of transport planning in the Perth metropolitan area. However, the "predict and provide approach to transport planning is still alive and well in state government agencies. It's time to switch to the "predict and prevent" approach that is being applied in the UK. Reduced car use (page 134) is an element of demand management but funding cuts to the TravelSmart program and Transperth's budget are undermining the potential success of this approach. The City of Fremantle requests that the draft strategy proposed actions reflect this and are changed to ensure consistency in approaches to reduce impacts from the transport sector.	Agreed
200302959: City of Fremantle	37	The development of regional transport plans is a worthwhile initiative (proposed action 4.33) but there must be a partnership between state and local governments to ensure it is effective and is implemented.	Agreed
200219334: Peter Ravine	1	The submission outlines a concept for a standard gauge rail connection from Perth to Darwin via Katherine serving coastal communities and industries en route. West, northwest and north coastal regions of Western Australia, need to be connected together and to Australian transport networks with appropriate surface transport infrastructure. The northern climate makes coastal regions more liveable than inland areas. Major towns are on or near the coast. The trend seems unlikely to change.	Noted with interest

Managing Freight and Regional Transport *continued*

200301109: Bruce Aulabaugh	43	The sustainability strategy also refers to better land use transport integration to reduce freight transport impacts. Although the Freight Network Review is well underway and there is a list of recommended actions, there are no well publicised strategies or other 'background' papers that clearly document the key landuse/transport integration features to be included in future planning. Further investigation is needed to determine if the state is doing the homework to be able to define what such 'integration' will entail.	Multi modal freight centres (close to industry) are discussed in this regard.
200302968: Beverage Industry Environment Council	16	Transportation – Front Of Pipe - Effective implementation of sustainable waste management depends largely on the transport component; i.e., transport of raw materials to processing facilities and the subsequent transport of products from such facilities to markets.	Noted.
	17	Transportation – End Of Pipe - Further, with respect to packaging or product that finds its way into rural and the more remote areas of the State - and the return of the recycled product back to markets or re-use opportunities in the major centres (or indeed overseas) - sustainable back loading or return transportation needs investigation.	Noted.
200300368: City of Kalgoorlie- Boulder	35	The development of a regional inter-medial transport hub, within the goldfields will take pressure of the transport system in the metropolitan region and assist in the delivery of freight to the sou-west and Pilbara. Presently a large portion of freight is transported through to the metropolitan area only to be off-loaded and sent back along the route it has just completed, this is a waste of time, money and resources and in no way aligns itself with the concept of sustainability, the introduction of one or more regional inter-medial transport hubs will provide a more efficient regional transport system.	Agreed. This will be considered.

Managing Freight and Regional Transport *continued*

200303443: State Development Portfolio	154	Whilst the objectives for increasing the use of rail transport outlined in this section (p.144) are supported, the Strategy provides limited information as to how this is to be achieved and what possible disincentives are to be used to discourage road transport (e.g. road tolls). It should be noted that rail is not cost effective for low volume, short haul freight with multiple origin/destination pairs. The costs of intermodal transfer at each end of the chain is also an issue.	This is addressed by the Freight Strategy.
200302729: Shire of Serpentine- Jarrahdale	7, pg. 14	<i>Proposed Actions</i> Expanding the use of rail over trucks is an excellent step towards achieving sustainability. When expanding the freight network local communities affected need to be engaged to ensure conflicts can be either avoided or reduced early in the planning stages.	Noted.
	6, pg. 14	The relationship between freight and health needs to be recognised.	Noted.
200302774: Waste Management Association	p.11	Effective implementation of sustainable waste management depends largely on the transport component; i.e., transport of raw materials to processing facilities and transport of products from such facilities to markets. The closer processing facilities are to the source (particularly with respect to municipal wastes) the more efficient and sustainable the overall waste management system will be.	Noted. This could be pursued by the Waste Management Board.
200300358: F. Schnattler	63	Build a new harbour south of Fremantle and move all the existing infrastructure there. A big harbour must have an excellent, ie. a direct, highway, or freeway, and railway connection(s)! Also build smaller harbours along the Metropolitan coastline if necessary. This will help to reduce freight movements on the overcrowded roads.	This is the new Outer Harbour proposal being developed at present. Other harbours are being upgraded in regional areas.
		Vision long-term concepts for country passenger rail and air transport, and realise them progressively.	Noted.
		Vision 'common sense' Regional Transport Plans for freight and passenger services in country and city regions with the input of all stakeholders.	Noted.

Preserving Air Quality

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	66	The Perth Air Quality Management Plan (AQMP) requires Local Government to support lead agencies in the implementation of a number of actions identified in the plan (Action 4.34). The extent and level of Local Government support in implementing the AQMP recommendations is not clear, although it is recognised that some of the support actions (community education, greenwaste collection and transport planning) are already being undertaken by member Councils of the EMRC. Many actions associated with this action could be administered through Local Government such as proposed changes to the Building Codes of Australia.	Noted.
	67	The development of a Statement of Planning Policy for Integrated Land Use Planning and Transport (Action 4.35) is supported and will provide much needed guidance and consistency in Local Government's approach in this area. Local Government is a key player in the delivery of this action and the proposed State-Local Government Partnership to progress this is supported (Action 4.35).	Noted.
	68	The continued provision of community information and education to change behaviour with regard to the burning of domestic wood fires and non-car modes of transport (Action 4.36) is supported. This action links with many activities Local Government's are undertaking through the Cities for Climate Protection Program and opportunities to form partnerships should be investigated to assist in the delivery of this information.	Noted.
200302959: City of Fremantle	38	Local governments have taken an active role in the protection of local air quality and at times are best suited to deliver localised programs for the community...Greater attention and resources through the implementation of the Perth Air Quality Management Plan should be afforded to local government to pursue effective programs aimed at improving local air quality.	Noted.
	39	An additional target for this section should included which states a timeline by which Perth is the cleanest city for its size in the world. This target should also be consistent with best practice and be supported by government with resources to achieve it.	All indicators and targets have been removed from the final Strategy.
200302880: City of Wanneroo	42	The objectives for these action items should seek full compliance with World Health Organisation standards.	Agreed

Preserving Air Quality *continued*

200302856 City of Stirling	24	Action 4.36 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.	Agreed
200300368: City of Kalgoorlie- Boulder	36	Perth based – fails to include and/or plan for other areas. Also fails to recognise other areas that may be managing air pollution issues well. Buffer zones for industry must be maintained to minimise off-site effects, the reuse of by-products, normally considered to be wastes, should be encouraged in order to minimise off-site impacts as well as minimise resource loss.	The final Strategy has increased emphasis on air quality in selected regional areas.
200300305: Institution of Engineers	44	Sustainable use of resources would suggest that only where monitoring or other means of measurement indicates that an air quality problem exists should there be a significant allocation of resources to reduce and manage industrial emissions. At the present there are worrying signs emerging that simply the suspicion or perception of air quality effects is enough to require the costly allocation of reduction measures, contrary to benefit-cost guidance. The State Government should display leadership and insist on rational allocation of limited improvement funds. The reporting of air quality issues in the popular media is often done in a way that exaggerates the true impacts and gives undue credence to alarmist and often poorly informed views. It fails to balance this adversarial view with the evidence of the agencies and specialists with detailed familiarity of such issues, in preference to the more visible and publicity-seeking activists. This tendency needs to be resisted by Government.	Noted.
200218007: Bunbury Port Authority	4	There has been recent media articles regarding the air quality around Kwinana, sustainability needs to reflect decentralisation of major industries to the region to assist with the development and growth of these areas.	Noted
200302729: Shire of Serpentine- Jarrahdale	8, pg. 14	Car usage in Perth is the major contributing factor and with increasing urban sprawl and the slow development of train services and the low usage of existing services, this is the key area to tackle to achieve improved air quality. The proposed actions do not address the interactions of behaviour that planning can influence. It also doesn't explore stronger measures such as car taxes, incentives for public transport especially by companies and agencies.	Noted.
200303143: Royal Automobile Club of WA	Pg. 14	Generally agree except for item 4.34. The Perth Air Quality management Plan is to provide air of a quality that is acceptable to the people. [How do you judge?] This may not mean that it is the cleanest for a city of its size	Value-based environmental objectives are the Department of Environment's preferred approach. The vision has been altered.

Preserving Air Quality *continued*

200303076: WA Sustainable Energy Association (WA SEA)	6, p.9	In relation to sustainable combustion, projects can be delayed due to uncertainty about and perceived air quality issues. Often, due to the newness of renewable energy projects, they are required to have very much higher emissions control than coal-fired power stations. This is an area where the Government can take action and develop clear guidelines and policy that place sustainable projects on an even footing with fossil fuel.	Noted. This is an Environmental Protection Authority process.
200300358: F. Schnattler		Tackle especially motor vehicle emissions and area-based sources of pollution. Increase the number of facilities that make up the Perth's Air Quality Inventory to 500 by the year 2008.	Noted.
		All the weather reports on the TV channels hardly ever talk about air quality! It is a shame! How can the community become more aware of the possible fatal consequences of its daily actions in relation to health when there is no daily confrontation with this essential issue in the media?	Noted.

Reducing and Managing Waste

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	71	Working towards a zero waste society (Action 4.41) and recognition of Regional Councils showing how this can be achieved is commended, particularly given the achievements the EMRC and its member Councils have attained in this regard.	Agreed
	72	Engagement in sustainable waste management by Local Government and the Waste Management Board through the State-Local Government Sustainability Roundtable is supported (Action 4.42). The EMRC have been involved in the roundtable and propose to play a leadership role in future roundtable forums.	Noted
	73	The introduction and enactment of the Waste Management and Contaminated Sites Bills (Action 4.43) has important implications for Local Governments and industry. The legislation, once enacted, should have positive outcomes in terms of the identification and clean up of contaminated sites in the region.	Agreed
	74	The EMRC is represented on the Waste Management Board and will provide input through this forum into the development of a detailed plan for each waste stream to outline how Western Australia will achieve the goal of zero waste (Action 4.44) and the administration of the waste levy to reflect environmental and social costs of waste disposal (Action 4.47).	Agreed
	75	The EMRC is committed to recycling at an organisational level and actively recycles a range of products (Action 4.45) from paper to organic material used for an office worm farm. Support is given for the encouragement of other Government agencies to act as leaders to their community, particularly State Government agencies.	Agreed
	76	The proposed action to require all Regional Organisations of Councils or Local Governments to prepare Waste Management Plans is generally supported and will ensure that waste management activities are identified and planned. The EMRC has undertaken significant research and prepares development plans for the Red Hill Waste Disposal Facility to guide future activities. The scope of information and content proposed for the Waste Management Plans will need to be discussed and negotiated with Regional Councils and Local Government.	Agreed

Reducing and Managing Waste *continued*

200300363: Eastern Metropolitan Regional Council	77	Examining how the Waste Management Board's waste levy can better reflect environmental and social costs of waste disposal (Action 4.47) is supported. The setting of mandatory waste targets for hazardous wastes (Action 4.49) and undertaking a comprehensive review of hazardous waste reduction in Western Australia (Action 4.50) are important short term actions to resolve the current crisis in hazardous waste management.	Agreed
	78	Requiring the Resource Recovery Precinct Team to nominate and establish 5 resource recovery precincts for the metropolitan region (Action 4.51) will need to be undertaken in consultation with Local Governments, as well as community organisations and the Waste Management Board.	Agreed
200219510: Ed Nieman	11	It is important that organic waste gets returned to the farm as fertilizer. At Enviro 2002, Gerry Gillespie of Resource NSW mentioned that Australia compacts thousands of tonnes of organic wastes, and the minerals and trace elements they contain, into land-fills every year – even though 75% of the nations agricultural soils have less than 1% organic material. Gillespie said: "We are now facing the development of waste-to-energy programs which will see even more of this material burned to a contaminated ash then land-filled, this material can never be returned to the land". (I like to call it 'haste-to-entropy'). He said about 60% of all materials going to land-fill are organic.	Agreed. The work of the Southern Metropolitan Regional Council is a model response to this issue.
200300140: The Wetlands Conservation Society	6	The draft Strategy does not have a section on environmental protection. Clearly the WA Environmental Protection Act is in urgent need of review to make it compatible with sustainability. There are also several features of the Act that do not work well at present, especially in regard to waste management and land use planning. Also the process for developing environmental protection policies is too cumbersome and appears to have broken down.	Noted.
200300889: John Vukovich	63	"Objective; Prevent the generation of waste". A laudable but impossible objective. It would be more practical to minimise the generation of waste by minimising the transformations of energy.	Objectives have been amended.
200303065: City of Gosnells	45	A coordinated approach to green procurement across all levels of government is required, and it is strongly recommended that local government be included, or given the opportunity to become involved in any green purchasing agreements that the State government negotiates. Similarly, green procurement policy should be a matter for shared input and implementation. A consistent approach is essential.	Agreed. This is reflected in <i>Embracing sustainability in government agencies</i> .

Reducing and Managing Waste *continued*

200303065: City of Gosnells	46	The Thomas Road Recycling Facility in Kwinana is an example of best practice waste minimisation in the State. This site recovers construction and demolition waste, a major part of the waste stream. Improved incentives are needed to encourage this type of innovative facility over traditional landfill as it is considered that the current environmental levy does not provide a sufficient 'carrot'. In addition, it should be noted that once started, this type of facility will need to be protected against the establishment of traditional landfill sites operating in competition, as this may undermine the viability of the more sustainable operation.	Noted with interest.
200217953: The Market Place Company	37 38 39	The Strategy lacks such incentives in all key actions. Instead it proposes a series of programs to explore opportunities for improvement. The key barrier to its success is the gap between stakeholders' incentives and the actions that are desired of them. <i>Recommended solution:</i> <ul style="list-style-type: none">· Create a market-based instrument (MBI) that represents a property right for sustainable waste management;· Create a new market with transparent price discovery around the value of sustainable waste treatment;· Impose a liability upon waste generators to offset a mandated proportion of their activity through the purchase of the MBI. The result would be to incentivise sustainable resource management at every point in system, leading both to waste avoidance and increased resource recovery.	This could be considered by the Waste Management Board.
	40 41 42	The Strategy proposes ambitious waste prevention and resource recovery targets, but: <ul style="list-style-type: none">· There is no guaranteed link between the specific goals and targets as proposed and such a large diversion of waste from landfill to recovery;· While reporting is suggested, mandatory targets for key waste generators are not. Historically, voluntary targets have proved ineffectual. Mandatory targets are much more successful in achieving outcomes. <i>Recommended solution:</i> <ul style="list-style-type: none">· Impose a liability on waste generators to create or purchase a number of the certified offset instrument, calculated as a certain proportion of their waste;· Set this percentage such that the aggregate amount of sustainable waste treatment is equal to the Strategy's targets.· Set a price for non-compliance such that there is a financial incentive to encourage desired behaviour and investment.	This could be considered by the Waste Management Board.

Reducing and Managing Waste *continued*

200217953: The Market Place Company	43 44 45	<p>The primary barrier to increased uptake of resource recovery technologies in Western Australia is the current low-cost of landfill disposal. It reflects:</p> <ul style="list-style-type: none"> · The insulation of the waste management industry from market forces that would discover the value that society places on alternative treatment; · A subsidy paid by future generations who will have to deal with the unaccounted for externalities of current practices. <p><i>Recommended solution:</i></p> <ul style="list-style-type: none"> · Impose a liability on waste generators to create or purchase a number of the certificated offset instrument, calculated as a mandated proportion of their waste; · Set the price for non-compliance such that it is more efficient for waste generators to discharge their liability through eligible offset activities, or through the purchase of certified offset instruments from other parties. <p>By setting the price of non-compliance higher than the price to supply offset activities, there will result an immediate increase in the flow of capital to those operations that offer the most efficient (and hence cheapest) environmentally and socially beneficial systems.</p>	This could be considered by the Waste Management Board..
	52 53 54	<p>The support programs that are outlined (p150) will be ineffectual unless backed by financial incentives for both:</p> <ul style="list-style-type: none"> · Input ñ incentives for collection and treatment; · Output ñ incentives for storage, distribution and marketing. <p><i>Recommended solution:</i></p> <ul style="list-style-type: none"> · Impose liability on waste generators to offset a mandated proportion of their activity by the creation or purchase of certificated instruments; · Make it an eligibility requirement for the creation of the offset instrument that recovered resources be sold into accredited sustainable markets. <p>The resulting flow of revenue would support both the input and output stages of these markets. Also, the market ensures that the supply of offset instruments will only be equal to demand, which is the mandated liability of waste generators. Consequently the development of demand for recovered resources will be proportionate to their supply.</p>	This could be considered by the Waste Management Board.

Reducing and Managing Waste *continued*

200217953: The Market Place Company	55 56 57	The Strategy adopts a whole of system approach, and recommends action at every stage of the life cycle of goods and services to avoid and prevent waste (pp 148-9). However, it does not propose the incentives that will bring about desired actions. <i>Recommended solution:</i> · Impose a liability upon waste generators for unsustainable waste disposal; · Create a penalty for non-compliance. Cost would be created in any part of the product lifecycle that results in unsustainable waste disposal, with a consequent influence on whole of system behaviour towards sustainable outcomes.	This could be considered by the Waste Management Board.
200302968: Beverage Industry Environment Council	1	BIEC has no issue with the waste management related aspects of the document. However, requirements relating to waste management under the proposed "Sustainability Code of Practice and Action Plan" should be for sustainable waste management, which includes sustainable recycling.	Noted
	3	The Waste 2020 vision is " Towards zero waste by 2020", the vision is not "...for zero waste by 2020".	This is reflected in the final Strategy.
	4	The Strategy provides the basis for all levels of government, industry and the community to work <u>towards</u> the goal of Zero waste. It is hoped the new Waste Management Board will abide by their commitment to further develop the Waste 2020 Strategy, including moving forward with the individual Key Actions.	Noted.
	6	Waste Hierarchy -BIEC members support the Strategy's emphasis on the 3R's in the hierarchy as the most environmentally sustainable opportunities to manage packaging waste.	Noted
	8	Extended Producer Responsibility -The Strategy's stated intention to introduce Extended Producer Responsibility contradicts this State's ongoing support and development of actions to comply with the National Packaging Covenant, a voluntary "shared responsibility" arrangement at the national level.	Noted.

Reducing and Managing Waste *continued*

200302968: Beverage Industry Environment Council	9	Competition / Commonality - Subsequent to this strategy document being actioned, emphasis should be placed on the compatibility of any subsequent policy and/or legislation to ensure that competition issues and issues of national commonality are addressed. For example, the current trend towards Sustainability Covenants is noted with some concern, recognising that this form of management is being undertaken without apparent jurisdictional cooperation or coordination. The creation of several different forms of operating environments for national and international businesses and industry within this country could impact significantly on regional viability and economic opportunities.	Noted.
	10	Regional Councils - BIEC welcomes the opportunity to work with regional councils – allowing for greater opportunity to disseminate training and education programs and the more efficient implementation of resource recovery programs.	Noted
	12	Government Agency Adoption Of 'Buy Recycled' And Recovery Policies - The Beverage Industry Environment Council will continue to support Government activities aimed at boosting material recovery and recycling within state government agencies and by their subcontractors.	Noted
	13	Waste Management Plans - Waste Management plans should be implemented where possible on a regional basis to ensure that - particularly in rural and regional WA - opportunities for the recovery and reuse of larger volumes of materials and the inherent savings from regionalised services (waste collection, recycling, transportation, procurement, etc) are realised.	Noted.
	14	Landfill Management - Waste Management plans should address the closure of inadequately constructed and managed landfills, their replacement with transfer stations and recycling centres, and the creation of regional landfills for the region's waste residue.	Noted.
	15	Resource Recovery Precinct Teams - Industry should be represented on the Resource Recovery Precinct teams. BIEC, in particular, already plays a role in the diversion of packaging product from the hospitality industry - hotels, restaurants, food courts, public places, etc - and other commercial tenements.	Noted.
200302856: City of Stirling	25	Actions are generally supported.	Noted

Reducing and Managing Waste *continued*

200300145: Sustainable Population Australia Inc. (second submission)	3	A key target for sustainability is on p.150: "Reduce resource consumption by a factor of 4 by 2020" This is an admirable target which should go a long way to achieving sustainability, but it has profound implications for the people of WA.	Agreed, but an increasing global goal.
	4	With continuing population increase this means that the citizens of WA will need to reduce their individual consumption first to a quarter, then to a fifth, and so on.	Noted
	6	For sustainability to be understood the targets need to be quantified while allowing for population size and growth. Failure of the document to acknowledge this could reduce its value to little more than wishful thinking.	Targets are removed.
200300368: City of Kalgoorlie- Boulder	37	The ' <i>Towards zero waste by 2020</i> ' has been misquoted, reading "elimination of all waste by 2020 rather" than "towards zero waste by 2020'. Misinterpretation such as this may have a detrimental effect on industries perception of where the state government is heading with regard to policy.	Agreed. Changed
	38	A target of this section reads – 'reduce resource consumption by a factor of 4 by 2020' – this statement seems very vague, has this yet been benchmarked, how and by whom using what process will the present resource consumption rate be ascertained.	This if the eco efficiency agenda. See 'Natural Capital'.
	39	The local governments should receive extra funding, or funding incentives, to achieve a reduction in consumption and waste and prepare the comprehensive audit and prepare the waste management plan.	This is an issue for the Waste Management Board.
200303162: R. Chapple & G. Watson, MLC's	2, p. 5	Section on waste does not develop a coherent framework for eliminating waste to zero and moving away from waste 'management' toward fully integrated recycling or elimination of waste streams altogether.	The Waste Management Board has released its draft Strategic Framework for Waste Management.
	2, p. 5	Suprisingly little emphasis on consumption patterns, since we are among the highest per-capita consumers of energy, water and products on earth.	Noted.

Reducing and Managing Waste *continued*

200303161: William (Bill) Grace	20	<p>Waste: The description of the activities and progress of the Waste Management Board and the Waste 2020 strategy in the draft Strategy infer significantly more achievement than has actually occurred. A year after its establishment the Board's achievements are minimal, and the promised review of the Levy, promised for September last year has only recently been commissioned.</p> <p>In the meantime landfill continues virtually unabated and unaffected by the existing \$1/tonne levy. Virtually no-one in the waste sector believes that the objective of eliminating landfill by 2020 will occur with the present level of commitment. In the meantime the day to day problem of municipal waste management remains with local government, and it is they rather than State government who are responsible for the resource recovery initiatives underway presently.</p> <p>It is questionable whether the WMB as currently constituted will deliver the outcomes described in the draft Strategy. The final strategy should report on the actual progress of the WMB in meeting its objectives and confirm the timing and content of the Waste Management Bill.</p>	Noted.
200303071: Greenpeace	1, p.2 1, p.3	<p>By leaving the door open for high temperature treatment technologies, the State Sustainability Strategy inherently contradicts its own goal of zero waste. Mass burn incineration, pyrolysis, gasification and other technologies whereby waste is broken down by heat ("incineration") should be specifically excluded under the Strategy.</p> <p>A larger vision is needed to see the loss of energy that incineration represents. The State Sustainability Strategy must provide this vision.</p>	This is implied through the waste hierarchy.
	5, p.3 6, p.3 1, p.4	<p>There is no role for incineration of waste on the path to Zero Waste. It must remain outside any acceptable Waste Hierarchy and be rejected as a 'renewable' source of energy.</p> <p>The aim of Zero Waste is the elimination rather than the "management" of waste.</p> <p>If incineration was established as a waste disposal method in Western Australia, future attempts to reach zero waste will be continually frustrated by the impact of incinerators on waste management infrastructure and their long tenure over waste streams.</p> <p>See document for details</p>	See above

Reducing and Managing Waste *continued*

200303092: Housing Industry Association (HIA)	10, p.13 and 2-3, p.14	HIA recommends additional Proposed Actions to capture these following points: HIA GreenSmart's Waste Reduction Project is a key action now underway through a grant from the Waste Management and Recycling Fund to reduce construction and demolition waste in Western Australia's housing sector. The avoidance, reduction and reuse of construction and demolition waste should be a priority for the Waste Management Board. An issue with waste grants distributed under the Waste Management and Recycling Trust Fund from monies collected as landfill levies since the mid-1990's has been the lack of accountability – of monitoring of recipients and the lack of a strategic, targeted focus. In the future, the Waste Management Board should develop priorities and strategies to target waste reduction by each sector of the State's economy, and advise industry and community members of its strategic directions on a periodic basis.	Noted
200303443: State Development Portfolio	163	In the Indicators and targets (p.150), the "reduction of resource consumption by a factor of 4" appears to be a simplistic target with no definition to assist in measuring achievement. It also needs to recognise that resource consumption is impacted by a variety of factors including technology, relative prices of inputs, etc. It also needs to define whether resource consumption is to be measured in absolute or efficiency terms and is to include land, account for exports, and consider issues associated with reduced incomes of resource producers if their output is curtailed.	Removed
200303416: Quinns Rocks	2, p.3	The Waste 2020 vision should be pursued through cleaner production initiatives, community recycling and composting programs, market development for recyclables and action on hazardous waste (pages 149 – 150).	Agreed
200302729: Shire of Serpentine- Jarrahdale	9, pg. 15	Zero waste should be the vision by 2020. This implies that waste is seen as a resource and stays in a closed loop system. It is a much stronger vision.	Noted.
	1, pg. 15	<i>Proposed Actions</i> The indicators are excellent for waste but that proposed actions are not strong enough to achieve these targets.	Removed
	2, pg. 15	Action 4.45 The use of recycled products should be mandatory for state government agencies by 2010. Government should lead by example and this will drive the market for sustainable products.	The shift to this area is supported through Sustainability Procurement.
	3, pg. 15	Action 4.48 go beyond encouraging agencies to ensuring government agencies reduce consumption and waste	The shift to this area is supported through Sustainability Procurement.

Reducing and Managing Waste *continued*

200303269: Global Olivine	5-7, p. 6	Maximisation or Optimisation?: The current section "Reducing and Managing Wastes" makes frequent references to the need to maximize certain activities. Its use suggests that in some instances at least little if any thought has been given as to whether or not maximizing a given activity will be sustainable. For example, we are told that the government has committed to maximizing the recovery and recycling of resources from waste into the same form as which they are delivered. In some instances this may be environmentally sustainable. We would suggest however, that it is highly unlikely that it will ever be economically or socially sustainable. We would suggest that optimization of the recovery and recycling of resources from waste, will deliver a result that is more closely aligned to the tenets of sustainability as it suggests that a balance will be sought by the often competing demands of the sustainability model. A lack of clarity in drafting the sustainability strategy, will lead to the propagation of activities which are unsustainable.	Noted.
	8-10, p.6, 10, p.7	It does not appear that the authors of this section of the report have given any thought to the rationale that they will use to establish the basis on which they will recycle. As noted above, they are seeking to maximize the recycling of resources from waste. The current document makes a blanket assumption that the recycling of all those materials that can be recycled is in and of itself sustainable. Yet it gives no indication that this assumption has been tested. This is not to suggest that GOWA is anti-recycling. Far from it. What we are against however, is recycling that does not constitute the most sustainable basis on which a "waste" resource can be utilized. For example... The drive toward recycling must be based on assessments of what is in fact sustainable, not what habit and ideology suggests may be sustainable.	Noted.

Reducing and Managing Waste *continued*

200303269: Global Olivine	2-5, 7-9 p.9	<p>This section of the document makes a number of other assumptions that do not appear to have been tested in terms of their sustainability. By adopting these untested assumptions, the Government is setting artificial boundaries that will prejudice the basis upon which an approach to management of waste is considered....Example of these assumptions;</p> <p><i>"Waste Management decisions to achieve zero waste will be based on a rigorous application of the waste management hierarchy"</i> This statement suggests that Government is satisfied that the waste management hierarchy will deliver sustainable waste management. Where is the proof for this? We would agree that the waste management hierarchy is a useful guide. But to suggest that in and of itself the waste management hierarchy will deliver sustainable development in the waste management sector is at best simplistic. In addition, its application is largely subjective. Using it as the basis for assessment allows a system such as ours that is focused on recovering and recycling of materials and value from waste to be ranked well down the hierarchy because one of the things of value that it recovers is energy. The waste management hierarchy makes little provision for the wide-ranging elements that are outlined in the sustainability assessment section of the Consultation Draft. Accordingly, it should only ever be a part of the sustainability assessment process.</p> <p>The basis of sustainability assessment must be extended well beyond the simplistic and subjective approach created by adoption of the waste management hierarchy.</p> <p>The Consultation Draft contains a version of the waste management hierarchy that differs from that generally referenced to in literature around the world. Normally the waste management hierarchy is limited to the reduction, reuse, recycling, recovery and lastly disposal of waste. The hierarchy included in the draft singles out energy recovery for special attention and places it well down the hierarchy. What rationale/sustainability assessment was used to justify this variation? Did this rationale take into account the fact that man's ever increasing demand for energy and satisfaction of that demand with fossil fuel based energy sources has the single greatest impact on our environment?</p> <p><i>"It is expected that their (The Waste Management Board) plan will be based on achieving at least 70% of this goal (zero Waste by 2020) by reduction, reuse and recycling, and 30% through secondary waste reprocessing"</i>.</p> <p>This assumption simply compounds the problems that we see flowing from the previous assumption. ...</p>	The waste management hierarchy provides guidance to inform decision-making.
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Reducing and Managing Waste *continued*

200303269: Global Olivine	6-9, p.10	<i>"Waste to Energy will only be used in accordance with the waste management hierarchy, State Bioenergy Policy and where it can be justified on the basis of lifecycle analysis"</i> Why is it that one particular residual waste treatment technology should have been singled out for special treatment? That the authors of this section of the Consultation Draft should consider it appropriate to undertake rigorous assessment of a technology is encouraging. Regrettably the mechanism of assessment is largely subjective and the question that is left unanswered is why other solutions to the problems of waste management are not being similarly scrutinized?	Noted.
	7-9, p.11	How can members of the Waste Management Board who are actively involved in the operation of waste management technologies or the provision of advice and services to the waste management industry be considered to be independent? How can members of the Waste Management Board who have a pre-determined views as to what does and what does not represent sustainable development in the waste management sector be considered to be independent? If the Government is serious about establishing a sustainable waste management system, then it will ensure that the Waste Management Board is made up of independent parties not parties who may be compromised by vested interests.	Noted.

Reducing and Managing Waste *continued*

200303269: Global Olivine	8-10, p.11 3-5, p.12 2, p.13	<p>The Sustainability Strategy sets out a number of proposed actions. Some of these reflect the tenets of sustainability others do not. We believe that the following “proposed actions” do not properly consider the tenets of sustainability and as such need to be carefully considered; “4.44 <i>Require the Waste Management Board to prepare a detailed plan for each waste stream outlining how Western Australia will achieve the goal of zero waste</i>” The proposed action assumes that delivery of sustainable waste management is best achieved by continuing to view waste as a number of different streams. While this is convenient in terms of characteristics it does not encourage an holistic approach to waste...</p> <p>Treatment of waste streams in isolation from each other will not result in a system that comes close to realizing its potential in terms of sustainability.</p> <p>“4.45 <i>Encourage the use of recycled products by all government agencies, and the recycling of paper, glass, plastics, metals and organic wastes, as part of government’s Sustainability Procurement Policy and Sustainability Code of Practice.</i>” We have already raised some detailed questions regarding the sustainability of certain recycling practices. We believe that policies such as that contained in this proposed action need to be examined in terms of their actual sustainability rather than their perceived sustainability before they are rolled out. In this way Government will know that it is setting an appropriate example.</p> <p>4.50: WA needs a proper hazardous waste treatment facility that is focused on eliminating hazardous wastes. Transfer of the responsibility for management of hazardous waste to the private sector can occur but it must not be undertaken in the manner which is most expedient. It must be undertaken in a way that will lead to the most sustainable system developing.</p>	Noted.
	7,11 p.13	<p>4.51 Despite the wide ranging benefits that the RERRF can bring it has been repeatedly rejected by the Regional Councils for reasons which bear little scrutiny.</p> <p>The system structure of the system that delivers waste management services is critical to the overall sustainability of the service. This proposed action will simply sustain a system that is clearly not focused on delivering sustainable management of residual waste streams. It must be reviewed.</p>	Noted.
	6, p.14	<p>A properly constructed contract between Government and the Private Sector that incorporated an appropriate sustainability covenant that ensured that the interests of society were served would be a major step in ensuring the long-term sustainability of the waste industry in Western Australia.</p>	Noted.

Reducing and Managing Waste *continued*

200217953: The Market Place Company	p.10	<p>Market development for recovered resource streams: The Strategy hints at the need to establish and develop frameworks and structures (markets?) to enable recovered materials to be re-used and recycled. In the area of waste as Solid Organic Matter (SOM), this implies that waste needs to be recycled as feedstock for new products as a key action to increase the use of renewable and recovered materials (p149). The support programs that are outlined (p150) will be ineffectual unless backed by financial incentives for both:</p> <ul style="list-style-type: none"> · Input incentives for collection and treatment; · Output incentives for storage, distribution and marketing. <p><i>Recommended solution:</i></p> <ul style="list-style-type: none"> · Impose liability on waste generators to offset a mandated proportion of their activity by the creation or purchase of certificated instruments; · Make it an eligibility requirement for the creation of the offset instrument that recovered resources be sold into accredited sustainable markets. The resulting flow of revenue would support both the input and output stages of these markets. Also, the market ensures that the supply of offset instruments will only be equal to demand, which is the mandated liability of waste generators. Consequently the development of demand for recovered resources will be proportionate to their supply. 	This could be considered by the Waste Management Board.
	p.11	<p>Increased effectiveness of Waste Levy and other economic instruments</p> <p>Setting the value of taxes to encourage sustainable outcomes is difficult, and requires an estimate of the total cost of unsustainable practices.</p> <p><i>Recommended solution:</i></p> <ul style="list-style-type: none"> · Create a property right for sustainable waste management; · Create an exchange mechanism that allows the market to discover its value; · Replace the waste levy with a liability upon waste generators to submit a number of certificated offset instruments that would represent the mandated proportion of waste to be diverted from landfill to alternative treatment. <p>The discovery of the market value of sustainable waste management allows the value of other economic instruments (such as local governments' domestic waste charges and Advance Disposal Fees) to be set accurately.</p>	This action is being undertaken by the Waste Management Board.

Reducing and Managing Waste *continued*

200217953: The Market Place Company	p.11	<p>Improved adoption of new technologies for resource use & recovery</p> <p>The Strategy identifies the need for an improved process for the evaluation of new technologies to improve resource use and recovery. It should integrate strategic context, economic, environmental and social costs and benefits, at a local and regional level, and consider the whole materials flow system.</p> <p><i>Recommended solution:</i></p> <ul style="list-style-type: none"> · Development of ways to assist the commercialisation of technologies; · Improvement of the environmental performance and efficiency of existing technologies; · Establishment of the suitability of technologies and practices for regional applications. 	Noted. Technology development is supported through research undertaken funded by the Waste Management Board.
	p.13	<p>The best way to achieve the Strategy's goals : By failing to provide incentive mechanisms, the Strategy risks failing to deliver its policy objectives. In the pursuit of these desired outcomes, the adoption of a market-based mechanism will create the most efficient allocation of resources, and the strongest and clearest incentives. By discovering the price of sustainable waste management, a market based mechanism supports the four broad stated goals of the Strategy: Waste avoidance, Resource recovery, Reduced toxicity in products and materials, Reduced litter and illegal dumping (see document for details)</p>	This needs to be considered as part of the Waste Management Board's Strategic Framework for Waste Management.
	p.14	<p>See document for details on the Sustainable Waste to Resource Project</p> <p>The Sustainable Waste to Resource Project (the 'Project') addresses a number the key environmental issues raised in the Strategy: Water Quality, Land Degradation, Maintenance and Restoration of Farming Land Bio-diversity</p>	Noted.
200302774: Waste Management Association	5, p.7	<p>The term, "<i>Sustainable Waste Management</i>" is in fact ultimately a contradiction because eventually it is intended that there will be no waste. However, until that state is achieved waste should be managed in a sustainable manner. The term "<i>Waste Management</i>" should probably be replaced by a term such as "<i>Resource Management</i>" or "<i>Resource Stewardship</i>".</p>	The title has been changed to <i>Reducing waste and managing it as a resource</i> .
	3-4, p.8	<p>Reducing and managing waste</p> <p>We consider that this title is too negative. It should relate to waste as a resource. Suggested wording is: <i>Reducing waste and managing it as a resource</i>. -the WASTE 2020 vision is "Towards zero waste by 2020", NOT "achieve zero waste by 2020"</p>	Agreed. Changed.

Reducing and Managing Waste *continued*

200302774: Waste Management Association	p.12	<p>In the first paragraph delete the word “<i>management</i>” from “<i>Recent management experience.....</i>”.</p> <p>(2nd para) We suggest that the second sentence be reworded to read: <i>Sustainability requires a shift toward a closed loop economy, where the wastes from one part of society become the raw materials for another and <u>where we minimise our use of natural resources without compromising profit or production</u> and where we extract the maximum value from our natural resources.</i></p> <p>We suggest that the third paragraph be reworded to read: <i>Achieving this vision will require major advances in product <u>stewardship ,advances in and use of technology such as Cleaner Production and community, business, Government and industry</u> commitment for waste reduction. The development of markets for recycled materials is also an essential component of moving to zero waste. Government can take an active role in stimulating the development of markets for recycled materials through its own purchasing requirements as outlined in Sustainability and Governance: Embracing sustainability in government agencies.</i></p> <p>We agree with Government taking an active role, provided false unsustainable markets are not developed at the expense of other available sustainable options.</p> <p>We suggest that the fourth paragraph be reworded to read: <i>It is no longer acceptable <u>to the community</u> to continue to dispose of waste to landfill, and the community is demanding preventative strategies to <u>eliminate</u> wastes and particularly those that can enable the elimination of hazardous wastes. <u>Management of the treatment and storage</u> of wastes and the location of waste facilities have been of great concern to many in the community. <u>These concerns have arisen</u> especially since the Bellevue chemical fire—one of the largest chemical incidents in Australian history, <u>and recent community concerns about the management of hazardous wastes at the Brookdale Liquid Waste Treatment facility.</u></i></p> <p>The issue and concerns about the Bellevue fire were related to the management of the facility. The technology is well proven and commonly used.</p> <p>The proposal to increase the materials allowed to be accepted at the Brookdale facility raised serious concerns in parts of the community about the facility and management of hazardous liquid wastes in general.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. `</p>
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Reducing and Managing Waste *continued*

200302774: Waste Management Association	p.13	<p>Para 5 - The first of the five goals stated in the WASTE 2020 vision has been omitted. It is: <i>To achieve waste reduction, re-use and recycling outcomes which are environmentally, socially and economically sustainable.</i></p> <p>In the sixth paragraph, it is stated that the WMB's goal will be to achieve the Waste 2020 goal through 70% reduction, reuse and recycling, and 30% through secondary waste processing. We are not aware of any such commitment by the WMB. We are also very concerned about an arbitrary selection of numbers without any sound justification. We propose that the wording (if consistent with the WMB's approach) should be: <i>The government has established a Waste Management Board to implement the WASTE 2020 Strategy. It is expected that their plan will be based on achieving this goal through <u>a combination of sustainable reduction, reuse and recycling, and secondary waste reprocessing.</u></i></p> <ul style="list-style-type: none"> - It is not clear whether composting is meant to be part of the 70% or the 30%. - There is a bold assumption in the paragraph that, <i>"Life cycle cost analysis will be used to determine the most appropriate and cost-effective method of processing waste, incorporating the environmental and social costs of each method."</i> - Life cycle costs MAY be one factor in the determination of the use of a particular technology. Other factors include potential environmental impacts and their management, community opinions (for which costs cannot be allocated) technical and commercial availability of technologies. - If "Life Cycle Cost analysis" is implemented in detail, it will be a very costly exercise that will take a very long time. Life Cycle analysis as a whole is a useful tool if appropriately used. It is probably not the best method for determining the most cost effective waste processing method. - The economic, environmental and social aspects of waste management decisions all need to be addressed. These should be included in any life cycle analysis process. Technical feasibility will also be included and community opinion needs to be managed by processes that avoid DAD and BANANA etc. - The use of life cycle cost analysis is contradictory to the definition of sustainability; it only includes one component, i.e., economics. - Change the sentence on life cycle cost analysis to: <i>"The Triple Bottom Line (TBL) aspects of Sustainability i.e. Cost, Environment and Social will be used to evaluate the best methods of processing waste that have not found a home through recycling or reuse."</i> - Strict adherence to a waste management hierarchy (there is not one consistent hierarchy currently in use by Government in WA) that is not based on sustainability principles is not consistent with sustainable management of wastes. 	<p>Extra added on this.</p> <p>Removed.</p>
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Reducing and Managing Waste *continued*

Reducing and Managing Waste *continued*

200302774: Waste Management Association		Since waste management companies are also involved in the work towards a zero waste society, the action should read: Continue to work towards a zero waste society and recognise the success of those <u>individuals, innovators, industries and councils</u> who are showing how this can be achieved.	Agreed. This has been reflected in the final Strategy.
		This action is a mammoth task. It would be far more realistic to require the WMB to set priorities for management of waste streams and set a programme for development of plans. In any case, there is no goal, "of zero waste", the WASTE 2020 vision is " <i>Towards zero waste</i> "	Agreed. This has been reflected in the final Strategy.
		We agree with the intent of this action provided that application of the Sustainability Code of Practice results in realistic and sustainable resource use and recovery, not just promote the use of recycled materials regardless of whether or not such use is sustainable.	Noted.
		This action needs to state the objective for development of waste management plans. We suggest that the wording should be: <i>Require all regional organisations of councils and other Local government Authorities, to prepare waste management plans that identify waste management issues, identify appropriate sustainable waste management actions and set programs for implementation of the actions.</i>	The action has been reworded.
		We generally agree with this approach. However, we consider that the thrust of the fund should be optimisation of the use of particular resources, i.e., the WMRF to achieve sustainable resource recovery. Delete the repeated words, " <i>environmental and social costs.</i> "	Noted.

Reducing and Managing Waste *continued*

<p>200302774: Waste Management Association</p>		<p>This action seems to be too general to be meaningful. It requires further consideration and rewriting. Any setting of targets should not be compulsory. They must be set in consultation with industry and with due consideration of the benefits that the community gets from processes that produce hazardous wastes. .Targets to address existing problems should be set in consultation with etc and managed within licensing processes.</p> <p>-We are in agreement with this action, with the exception of: <i>Emphasis should be placed on rail transport of all hazardous wastes. Importing of hazardous wastes from interstate or overseas will be prohibited.</i></p> <p>-There is no need to place emphasis on rail transport. This approach is based on the assumption that transport by rail is always safer; this is not necessarily the case. Also, materials far more hazardous than wastes are transported in a safe manner daily in large quantities throughout WA in accordance with the requirements of the Dangerous Goods regulations and the Australian Dangerous Goods Code. The suggestion to transport by rail infers that the Dangerous Goods Regulations and the ADGC are inadequate, this is not the case.</p> <p>-It is necessary to be able to export wastes to other States and also accept wastes from other States. Commonwealth law already prohibits importing hazardous wastes from other countries.</p> <p>-Owing to the limited volume of hazardous wastes produced in WA it is often not economical to have facilities set up in WA to process the wastes. Consequently, it is sometimes necessary to send wastes to facilities in the eastern States. Also, to ensure some facilities in WA are financially viable, it is necessary at times for some wastes to be imported into WA for processing.</p>	<p>Noted.</p> <p>The action has been changed.</p>
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Reducing and Managing Waste *continued*

200302774: Waste Management Association		<p>-If importing of hazardous wastes from interstate is prohibited in every state, then as a country we would have to replicate hazardous waste treatment facilities in every state. This would be extremely wasteful!!!</p> <p>-Who is the "Resource Recovery Precinct Team"?</p> <p>-Why is industry excluded from the process?</p> <p>-What is the basis of "5" precincts, this seems to be a number plucked out of the air without any reasonable technical basis.</p> <p>-In any case, we consider that the establishment of waste precincts is against the principles of sustainability, particularly with respect to transport.</p> <p>-Waste facilities should be able to be set up at any location provided it meets planning requirements and is approved under the environmental assessment process.</p> <p>-Any precinct needs to be large enough for several operations and support operations. Where in Perth is such land available (other than in Kwinana which is principally reserved for heavy industry and for most waste facilities is too far from the source of the waste)?</p>	<p>Noted.</p> <p>This action has been removed.</p>
		<p>-Add: 4.52 <u>Encourage the collection and management of organic in forms that are best suited to the production of compost that can be used in agricultural and domestic situations.</u></p>	<p>Noted.</p>
		<p>Indicators and targets:</p> <p>-The aims of the WASTE 2020 strategy have been misused to promote a new vision. The WASTE 2020 vision is not zero waste by 2020. The first dot point should read: <i>Progress towards the vision of "Towards zero waste by 2020"</i>.</p> <p>-The second dot point seems also to have been, "plucked out of the air" without any reasonable basis. It needs justification and explanation. However, we agree with an approach to reduce resource consumption, provided that targets are realistic and achievable.</p> <p>-Comments on the third dot point are included above in the comments above on Paragraph 6.</p> <p>-Comments on the fourth dot point are included above in the comments on proposed action 4.51.</p> <p>Global.: We generally agree with the statement. However, innovative technologies need to be supported by appropriate Government actions.</p>	<p>Indicators removed.</p>

Reducing and Managing Waste *continued*

200305584: WA Local Government Association (WALGA)	p.5-6	<p>It is essential that consistent definitions of key concepts be used throughout government policy to ensure effective policy implementation. The title Reducing and managing waste is not in line with current policy terminology and should be altered to refer to waste as a resource. In addition, the development of consistent waste hierarchy that is based on sustainable waste management is vital for the coordinated success of the Strategy.</p> <p>As the Strategy reflects and largely relies on the aims and objectives of WASTE 2020, WASTE 2020 must be altered to consistently reflect the principles, objectives and actions of the Strategy. However, WASTE 2020 discusses “working towards zero waste by 2020” not “achieving zero waste by 2020” as stated in the Strategy. The document also specifies 4 waste precincts, whereas the Strategy states 5 and does not explain the justification for the increase.</p> <p>The Strategy does not refer to DEWCAP in reference to their waste management role and places all responsibility for waste management firmly onto the Waste Management Board (WMB). This ignores the roles which are not performed by the WMB and are rightly the responsibility of DEWCAP.</p> <p>MWAC has stated previously and continues to maintain that a legally separate, financially independent organisation should be established for waste management, ensuring that effective, sustainable waste management is achieved in Western Australia.</p> <p>The Strategy does not mention funding for the proposed actions and MWAC suggests that the review of the Waste Management fund reflect the proposed Strategy. Local Governments are concerned that they will ultimately be held financially responsible for the implementation of sustainable waste management in Western Australia and maintain that implementation will be inhibited if this is the case. Financial assistance from State government will be essential for the success of the Strategy.</p>	<p>Agreed. The title has been changed.</p> <p>Agreed.</p> <p>The final Strategy allocates responsibility for actions to the DOE.</p> <p>Noted.</p> <p>Noted.</p>
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Reducing and Managing Waste *continued*

200305584: WA Local Government Association (WALGA)	4-5, p.6	<p>The lack of reference to sustainable waste indicators and baseline measurements limits the potential for implementation of the Strategy. The development of measurable, relevant criteria may be one of the most significant outputs that the Strategy could provide. Even if the suggested actions are less than ideal, a rigorous method of evaluation will demonstrate how well actions are meeting the criteria that have been set. In this case, there is the opportunity to review the actions and make steady progress to more effective actions.</p> <p>The alternative is to proceed on a poorly defined basis – in which case it will be equally difficult to either prove or disprove the effectiveness of the actions undertaken – a situation which constantly calls into question the approach being taken.</p>	Noted. All indicators removed.
	6, p.6	MWAC supports the actions currently underway, with the exception of the development of a whole-of-government procurement policy for waste paper recycling. MWAC believes that the procurement policy should not be restricted to waste paper and should include all recyclables.	Agreed. Changed.

Reducing and Managing Waste *continued*

200305584: WA Local Government Association (WALGA)	p.6-7	<p>4.45 MWAC believe that the use of recycled products and the recycling of paper, glass, plastics, metals and organic waste by all government agencies should be a requirement, not just encouraged.</p> <p>4.46 MWAC support this action if other agencies and stakeholders are also required to implement actions</p> <p>4.48 MWAC believe that all government agencies should be required, not just encouraged to reduce consumption and waste.</p> <p>4.49 The intent of this action is unsure and therefore cannot be considered until its meaning is clarified.</p> <p>4.50 MWAC generally support this action with some reservation with respect to the transport and importing aspects of hazardous wastes.</p> <p>4.51 MWAC supports the formation of resource recovery precincts as described in WASTE 2020 where they are consistent with facility siting and proximity principles. The discrepancy between the Strategy and WASTE 2020 should be explained.</p> <p>The actions should be expanded to include reference to industrial wastes other than hazardous such as commercial and demolition waste, restaurant and supermarket wastes. Local government is not responsible for the collection or disposal of these wastes. The recent survey indicated that very little of this waste, particularly in rural areas, is in fact measured. Cleaner production programs should be required from industries generating wastes other than hazardous.</p> <p>The actions should acknowledge the impact of distance on waste management and the effect of this on rural Local Governments. Additional considerations must be discussed (possibly at the Roundtable) and incorporated into the Strategy.</p> <p>Indicators and targets: As previously discussed, WASTE 2020 advocates working towards zero waste by 2020, not achieving zero waste by 2020. The Strategy should be altered to reflect this or describe the change.</p> <p>The Strategy does not describe the origin of the factor of 4 reduction in resource consumption by 2020. In fact, MWAC believes that current levels of resource consumption are not known and are uncertain how the factor of 4 will subsequently be achieved.</p>	<p>Noted. Sustainability Procurement policy is being developed.</p> <p>Changed</p> <p>Noted.</p> <p>Changed.</p> <p>Changed.</p> <p>Changed.</p> <p>Removed.</p>
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Reducing and Managing Waste *continued*

200305584: WA Local Government Association (WALGA)	p.7-8	<p>Indicators and target: The Strategy refers to zero waste being achieved through 70% reduction, reuse and recycling & 30% secondary waste processing with no explanation of this choice of technologies or the assigned proportions.</p> <p>As previously discussed, MWAC supports the formation of resource recovery precincts as described in WASTE 2020. The discrepancy between the Strategy and WASTE 2020 should be explained.</p> <p>Funding: It should be acknowledged that a limited pool of funds is available to Councils for the range of services they provide. It is unlikely that significant increases in resource allocation for waste management will take place in the highly competitive field of Council expenditures. Failure to recognize these very real resource restraints may well undermine critical areas of activity within the Strategy.</p> <p>Feasible funding scenarios for implementation need to be developed to ensure that adequate resources can be put to the task. Failure to provide adequate resources will lead to underperformance of existing programs and may unfairly colour the assessment of new programs or activities. Simply assuming that all sectors will be able to divert significant resources to the work of a waste education Strategy is courting failure or patchy uptake of actions.</p> <p>MWAC believe that a State Government Draft Budget for implementation of the Strategy be included in order to obtain an idea of the funds available and what will need to be covered by Local Government. Input from Local Governments regarding funding and budget arrangements in the initial stages of the development of the Strategy is essential.</p> <p>Opportunities: An opportunity exists with this document to take leadership in moving from “wastes” to “resources” and to fully investigate strategies to affect the environmental, economic and social impacts of waste generation in society.</p>	<p>This has been changed in the final Strategy.</p> <p>Noted.</p> <p>Noted. Changed to emphasise this.</p>
200300358: F. Schnattler	65	Demand and legislate the use of recycled products by all societal administration agencies, and the recycling of batteries, electric and electronic goods, glass, metals, organic waste, paper, plastics as part of the Societal Administrator's BEvolution Procurement System and BEvolution Code of Practice from 2004 onwards.	Noted.

Reducing and Managing Waste *continued*

200300358: F. Schnattler		The Waste Management Board's waste levy shall be collected at the time of purchase of products and services from 2004 onwards so that Regional Waste Management Councils have the means to deal appropriately with the social, ecotechnical, envirotive, and normative objectives of waste disposal and organisation	Noted – Not possible as waste levy is based on waste disposal.
		As stated in Draft Goal, however change the wording of the last two sentences as shown below: ... Emphasis must be placed on an effective, efficient and safe transport system for all hazardous wastes. Importing of hazardous wastes from interstate or overseas shall only be possible to the extent as Western Australia is responsible for the creation and existence of such hazardous waste.	Changed action

Our Water Future

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	79	The proposed actions to complete the State Water Conservation Strategy (Action 4.52) and establish a 10% reduction per capita in water use (Action 4.53) is commended. It is important to ensure that industry is identified as a major user of potable water and there are many opportunities to reduce water consumption in this area.	Noted
	80	The establishment of guidelines for household use of grey water (Action 4.54) is an area that needs considerable action from the State Government (Health Department), particularly given our current water crisis. Considerable information is available and already being implemented in other parts of Australia and the world in this area. The State Government needs to gain the commitment of relevant agencies to ensure that Western Australia adopt similar practices and utilises grey water at the household level in a safe and practical manner.	Noted
	81	The development of partnerships with Local Government to ensure water sensitive urban design (WSUD) is built into all urban development (Action 4.55) is not considered adequate. A planning policy and regulatory framework for WSUD by the State Government (through the Western Australian Planning Commission) is required to ensure that this is incorporated into zoning proposals and subdivision applications. The Department of Environment, Water and Catchment Protection should also be a key agency in promoting the adoption of WSUD, particularly in regards to research, institutional reforms and structural frameworks to improve stormwater management in Western Australia.	Noted
	82	The proposal to ensure that Regional Councils take more responsibility for managing groundwater, including bores, through the development of Regional Groundwater Management Plans (Action 4.56) is not supported, as this cannot be practically implemented at a regional level. All commercial scale irrigation bores established by Local Government are licensed through the Department of Environment, Water and Catchment Protection. The management of groundwater is a State Government responsibility and therefore this action requires review.	Recommendation does not go that far – just to put management of groundwater planning schemes.
	83	The construction of the Kwinana waste water reuse facility and individualized marketing of water conservation and supply options (Action 4.57 & 4.58) are supported in principle.	Noted

Our Water Future *continued*

200219350: Leschenault Catchment Council	2	The strategy promotes a strong focus on the development of Regional Sustainability Strategies and contains a number of recommendations that are designed to increase the implementation of water conservation measures in a manner that is consistent with meeting the goals of sustainability. However, a major shortcoming of this strategy is that it fails to recognise and address the environmental issues and associated effect that the diversion of water to the Perth metropolitan area from regional catchment areas has. In fact, the Premier announced the diversion of water from Wellington Dam before the findings of the State Water Symposium were released which is indicative of a government that is more concerned with addressing the constituents rather than sustainability. The true environmental costs in diverting these waters has not adequately been addressed and it is not sustainable for water to continue being diverted into the metropolitan area to continue to support and "top up" a City which is clearly not operating sustainably in regards to its water use.	Regional sustainability has been addressed in water matters in the past through an integrated system that enables dry areas to benefit from wet areas. Perth supplies the goldfields and South West inland.
	3	The unsustainable practice of developing new water resources outside of the Perth metropolitan region that permits further expansion of low-density residential areas in Perth is strongly opposed and does not reflect the 'regional focus' to which the strategy refers and promotes. The need to identify new water sources, as eluded to in the document, would not have the same urgency if water was not being seconded to support the Perth metropolitan area.	See above
200300362: The Wildflower Society of WA Inc.	10	Although the need to find new sources of water supply and new ways to save water may be one way of tackling our shortage of water we recommend that research on water drawdown and ecosystem functioning should be adequately funded to ensure that vegetation above groundwater extraction grounds is not adversely impacted by new and existing water resource developments. This should be added to the actions on page 153.	Noted. This is addressed in <i>Protecting drinking water supplies and aquatic systems</i>
200300357: The Water Corporation	49	The Corporation supports the water consumption per capita and wastewater reuse indicators and targets set out on Page 153, but suggests the following minor word changes. Annual water consumption per capita reduced from 170kl to 155kl by 2012 should be modified to include "for the Perth Integrated Water Supply Scheme". 20% recycling of wastewater by 2012 should be modified to include "State-wide". A possible alternative or addition to the preparation of ground water management plans could be the introduction of catchment water management plans, which could address the management of the total water cycle rather than just ground water. Permitted land uses would need to be a major consideration of these plans. These plans would address drainage as part of the water cycle. Regional planning would enable drainage to be considered on a catchment basis.	Noted.

Our Water Future *continued*

200300140: The Wetlands Conservation Council	18	We support Actions 4.52 – 4.58 but we would like to see a strong statement about identifying and protecting the State’s water resources through appropriate legislation and managing them on a sustainable basis with adequate provision for environmental needs. We would also like to see specific references to the development and implementation of the State Water Conservation Strategy that was released for public comment in June last year. This Strategy holds the key to substantial decreases in per capita water consumption. Excessive water consumption is an issue that WA needs to face up to urgently and it should be a key element of the Sustainability Strategy.	Noted.
200219175: City of Armadale	40	Groundwater boundaries have no relationship to Council (and hence Regional Council) boundaries. The current system establishing separate Groundwater Committees works and should remain. This Proposed Action is not supported and should be deleted.	Noted. The emphasis in the final Strategy is on demonstration projects with local government and regional councils.
200302880: City of Wanneroo	44	This would place additional burdens upon local government and Regional Councils, including obtaining appropriately qualified staff to manage such requirements. It would also perhaps remove the broader focus that is necessary in considering water supply that only state level agencies can supply. The need for a more efficient use of available water resources is supported, including the introduction of pricing structures that reflect the true cost of water usage.	Noted. See above.

Our Water Future *continued*

200302880: City of Wanneroo	45	Since the coming into effect of the new Rights in Water and Irrigation Act in January 2001, this City has been urging the State Government to establish a Water Resources Management Committee under that Act to deal with the Wanneroo area. Such a committee would involve local government and community representatives, as well as having necessary state agency expertise, and would be able to proceed to prepare Regional, Sub-regional and Local Area Management Plans as proposed under the Act. To-date, the government has not been prepared to give priority to the establishment of such a committee for this area however such an initiative would be clearly supportive of the water management objectives of the draft state Sustainability Strategy.	Noted.
	46	The Environmental Protection (State Groundwater) Policy should be finalised. Similarly the Gnamptara Mound Crown Land Statement of Planning Policy and the Environmental Protection (Gnamptara Mound Crown Land) Policy should be updated.	Noted.
200302856: City of Stirling	27	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.	Noted.
200300357: Water Corp	42	Also, "... there is a need to provide a vision for the future, new sources of supply and new ways to save water." The Water Corporation supports this suggestion and is already actively involved in progressing these issues. The 50% decline in runoff to dams in the South West is also flagged. The Corporation is currently working with stakeholders to consider options to actively manage catchments to enhance water quality and quantity and provide net economic, environmental and social benefits.	Noted
	6	the report suggests that "sustainability of our water supply is an issue of concern of many Western Australians, <u>especially those who live in the South West</u> ". The Water Corporation is of the opinion that this is an issue of concern to many Western Australians, but is not necessarily peculiar to those that live in the South West. Sustainability of our water supply is also of particular concern to those Western Australians who living in the northern and eastern parts of the State. Action: suggest delete "especially those who live in the South West".	Noted. This has been reflected in the final Strategy.

Our Water Future *continued*

200300357: Water Corp	43	Page 152 talks about water sensitive urban design that can contribute to the aesthetics of an area. Water sensitive design undertaken on a whole of community basis can result in a reduction of potable water use through better use and reuse of stormwater. It is possible to determine the water balance for a community and to determine a water a budget utilising potable water, stormwater and shallow ground water. The Water Corporation is undertaking a desktop study of utilising water in this way so that developers have the option of designing water sensitive communities.	Agreed.
	44	The Corporation supports the water consumption per capita and wastewater reuse indicators and targets set out on Page 153, but suggests the following minor word changes. Annual water consumption per capita reduced from 170kl to 155kl by 2012 should be modified to include "for the Perth Integrated Water Supply Scheme". 20% recycling of wastewater by 2012 should be modified to include "State-wide". A possible alternative or addition to the preparation of ground water management plans could be the introduction of catchment water management plans, which could address the management of the total water cycle rather than just ground water. Permitted land uses would need to be a major consideration of these plans. These plans would address drainage as part of the water cycle. Regional planning would enable drainage to be considered on a catchment basis.	All targets and indicators have been removed from the final Strategy.
	52	<i>Objectives:</i> We question the objective to extend responsibility for ground water supplies to local government (Regional councils) from the Water and Rivers Commission on the basis that the necessary resources and skills reside with the Water and Rivers Commission	Noted. The final Strategy has been amended.
	53	Guidelines for households' use of grey water have been drafted and are not a proposed action.	Noted.
	54	The Water Corporation's focus is setting out a 10 year plan to achieve the 20% State-wide reuse target, but is not currently considering how all wastewater could be reused in the longer term. Any proposal to do this would raise significant environmental, technical and cost issues.	Noted
200300368: City of Kalgoorlie- Boulder	40	All Western Australian communities should maximise the reuse of all water resources available to them, this should include rain, scheme, grey and effluent water. Kalgoorlie-Boulder is responsible for the sewer system and is presently the largest re-user of effluent water in Australia.	Noted

Our Water Future *continued*

200300368: City of Kalgoorlie- Boulder	41	The harvesting of stormwater should be a shared responsibility between state and local government.	Noted.
200319175: City of Armadale	38	Council has a history of pioneering in this area of water sensitive design.	Noted
	40	Groundwater boundaries have no relationship to Council (and hence Regional Council) boundaries. The current system establishing separate Groundwater Committees works and should remain. This Proposed Action is not supported and should be deleted.	Action supports more regional work similar to that in Armadale
200300305: Institution of Engineers	12	Sustainable pricing systems are needed for water and energy, that is policies and pricing structures that reward those who conserve and penalise those who use these resources excessively. Use of energy and water for non-essential lifestyle enhancement (i.e. home swimming pools, air conditioning systems, elaborate water features in home gardens etc) should require higher cost for those who choose this path.	Noted
200303162: R. Chapple & G. Watson, MLC's	2, p. 5	Suprisingly little emphasis on consumption patterns, since we are among the highest per-capita consumers of energy, water and products on earth.	This is addressed throughout the strategy.
200219350: Leschenault Catchment Council	4	LWCC is in agreement that integrated resource planning is vital in identifying sustainable alternatives for water conservation initiatives, however the strategy fails to make mention of State land use planning legislation which has a significant role to play in minimising urban water consumption. State planning legislation does not encourage water conservation principles, current R code zonings, block sizes, subdivision designs and the continual push for urban sprawl, which results in vast amounts of reticulated lawn in areas of public open space all encourage excessive water use, and does not set an appropriate standard for business, industry and general community to follow.	The importance of planning as a mechanism to support sustainability is emphasised throughout the Strategy.
200303163: Brian Fleay	5, p.5	The present trend is for the industry to become more energy intensive...The draft SSS does not mention these issues. The final SSS recommendations need to address them as a HIGH PRIORITY. The very viability of existing hydraulic infrastructure is at stake, let alone future additions. A starting off point would be to evaluate the direct and indirect energy inputs to all the goods and services used by the water utility industry and the trends of these. Water is a renewable resource. But the systems that mobilise it for human use are based substantially on nonrenewable resources.	Noted

Our Water Future *continued*

200217800: Michael Bell	41	<p>It is, or has been illegal, for some Perth hills residents to have rainwater tanks. There should be limitations placed on Swimming Pools, new swimming pools near the Ocean unless supplied water from a licenced bore should be banned. A financial incentive should be paid to remove swimming pools. Spas should be discouraged.</p> <p>Our water is too cheap, the true environmental and social cost needs to be taken into account.</p> <p>People do not appreciate or realize how little water is available and that it is not an endless resource.</p> <p>Manufacturers to introduce throughout their product range devices such as suds save washing machines and water efficient dishwashers that do much to save water.</p>	Noted
200303092: Housing Industry Association (HIA)	5, p.14	<p>HIA recommends that the Proposed Actions list should be expanded to include actions regarding:</p> <ul style="list-style-type: none"> -Water Corporation become an HIA GreenSmart Partner; (see document for details) -Greywater reuse options should researched by the Water and Rivers Commission and Water Corporation in consultation with industry and local governments and should be undertaken at the subdivision level, in preference to the household level for health and economic reasons. In this regard the work being undertaken by Sydney Water in Rouse Hill should be considered as a blueprint; -The partnership outlined in 4.55 should include industry. 	Noted
200303443: State Development Portfolio	164-165	<p>The opening statement in this section (page 151) regarding water use needs to be qualified. Perth per capita water consumption fell with water restrictions of the 1970s and has stabilised since. ...</p> <p>It is also suggested that in line with the call for increased transparency and accountability as part of this Strategy, the Water Corporation should be called on to provide clearer costing and accounting practices in relation to the derivation of costs for water provided from alternative sources (new extraction versus treatment/reuse).</p>	This is more comprehensively addressed through the State Water Strategy.
200303416: Quinns Rocks	2, p.3	Measures to better reflect real costs in the price of resources, travel and infrastructure should be in the final strategy.	Noted

Our Water Future *continued*

200309737: Office for Women	13	The State Sustainability Strategy currently holds a number of opportunities for the inclusion of gender equity principles. They include ensuring that: . mainstreaming a gender perspective into water resources levels, the shift of focus to date is very much a shift from a technical to an economic focus, which will not necessarily imply a positive change for women. A new vision for water resource management is needed e.g. to give adequate consideration to the roles, needs, access to and control over resources and decision-making of both women and men	Gender issues are addressed in the final Strategy.
200302729: Shire of Serpentine- Jarrahdale	5, pg. 15	<i>Objectives</i> *Grey water reused within all new developments by 2010. *Water Sensitive Urban Design for all new development across the State.	Targets and indicators have been removed.
	6, pg. 15	Action 4.53 the target of 10% reduction is very low considering simple cost effective technology such as water efficient showerheads, 4 and 5 star hot water systems, dual flush toilets and flow restrictors for taps amongst many others.	Targets and indicators have been removed.
	7, pg. 15	Proposed Actions: *Water sensitive urban design principles should be integrated into planning policy and encourage as the preferred urban form to achieve reduction of water use in the urban environment. *Incentive schemes could be introduced to householders to implement simple things like efficient showerheads.	This has been addressed in the final Strategy.
	8, pg. 15	<i>Indicators and Targets</i> What are the long term targets 20, 50 and 100 year targets for water consumption?	Targets and indicators have been removed.
200303590: WA Collaboration	Rec. 43	Sustainability of utility services All future publicly funded utility strategies, policies and decision-making processes should incorporate sustainability assessments. These sustainability assessments should include full life cycle assessments and culturally and linguistically appropriate social impact assessments for the various options for proposed utility service provision. Further, the principles of 'integrated resource planning' (as set out in the State Government's Draft State Water Conservation Strategy 2002), should be adapted and integrated into policy development and planning processes for all utility service provision.	Noted. See Sustainability Assessment.

Our Water Future *continued*

200303590: WA Collaboration	Rec. 44	Access to utility services In recognition of the essential nature of the services provided by utilities, the State Government should implement a 'Utilities Assistance Scheme'; implement a 'Customer Service Code' to ensure protection of all consumers; ensure that incentives and rebates related to utilities services are directed specifically at low income earners; and ensure that Aboriginal citizens throughout the state have equitable access to essential services like power and water.	Noted.
200300358: F. Schnattler	66	Allow household use of grey water by the end of 2003. Produce a Code of Practice that is easy to read and understandable for households.	Guidelines are now available.
		As stated in Draft Goal, however change the wording to the one as shown below:... waste water reuse and vision concepts for how all waste water could be used by the beginning of 2005.	Noted.
200304162: Environmental Protection Authority	Page 2, last para	It is noted that the holistic approach to water resource protection, as signed off by Government in the National Water Quality Management Strategy should be emphasised in the draft strategy.	Noted.

Sustainable Energy

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	84	The development of voluntary schemes with the housing industry to demonstrate at least 4 star energy rating on new homes (Action 4.59) is supported and will need to be developed in consultation with Local Government, who will be responsible for ensuring compliance with this initiative. A rating scheme for renovations (Action 4.60) should be developed in conjunction with a similar rating scheme for new homes (Action 4.59). The changes to the Building Code of Australia provide an opportunity for the State Government to work with Local Governments to incorporate rating systems into the building approvals process. Financial or other support/incentives for the application of energy rating schemes for buildings needs to be clearly identified.	Agreed. This will be the process
	85	The proposal to maximise solar orientation of new developments (Action 4.61) is supported and should be considered in investigations to apply statutory framework for the adoption of Liveable Neighbourhood principles (through the Cities for Climate Protection Program.	Noted.
	86	Encouragement of building design and management for energy efficiency for all government buildings (Action 4.62) is supported and is being progressed by the EMRC and member Councils through the Cities for Climate Protection Program. This is an important initiative and should be progressed by State and Local Governments as a priority for future development.	Noted.
	87	Eco-Loans (Action 4.63) will provide a practical incentive to low income earners to make the necessary changes to their housing design to achieve long term cost savings and reductions in energy consumption. This action could be coupled with the awareness and information campaigns being conducted by Local Government.	Noted.
	88	The development of Sustainability Action Plans as a demonstration of government leadership (Action 4.64) is supported and will provide guidance on a consistent approach for government agencies. Local Governments are addressing this through corporate action plans as part of the Cities for Climate Protection program.	Noted.
	89	Information gained through fuel trials (Action 4.65) should be made available to Local Government as they are also investigating alternatives for fleet vehicles.	Noted.

Sustainable Energy *continued*

200300363: Eastern Metropolitan Regional Council	90	Proposed actions related to power generation (Action 4.66, 4.67, 4.68, 4.69 & 4.70) should demonstrate a genuine commitment toward increased provision of energy from sustainable sources is achieved. This commitment is necessary to discourage the use of non-renewable energy sources in future power provision.	Renewables seem to grow best where market for power liberalised – this is happening.
	91	Implementation of energy minimisation at the household level and in government procurement activities (Action 4.71) should include liaison with Local Governments undertaking the Cities for Climate Protection Program as a number of similar projects have been implemented by WA Councils, particularly household energy conservation information programs.	Noted.
200219280: City of Swan	38	Generally agree, however the Building Code of Australia will also need to be modified to achieve the vision identified in the draft sustainability Strategy Report.	Noted.
200216374: Uranium Information Centre	1	The consultation draft of the WA strategy has 3 pages on "Sustainable Energy". These fail to address the question of electricity generation in any thorough way and completely ignore the matter of meeting base-load electricity demand in the state.	Noted.
	2	The draft's statement on p 154 that "The need for sustainable energy is about the transition from fossil fuels to renewable energy sources" is incorrect and misleading. Sustainability in energy is more complex.	Noted.
	3	Western Power Corporation generates some 12.4 billion kWh per year, almost 11 billion kWh of this being steam-generated. (Perhaps half as much power again is generated by gas turbines and cogeneration off the main grid.) We understand that most of the demand served is base-load, ie it requires continuous, reliable supply. The "renewables" advocated in the draft cannot meet this demand.	Many renewables can.
	4	While this Centre strongly supports the harnessing of renewable energy sources, particularly for electricity, there are practical limits in relation to the demand needing to be met in a developed economy such as WA. Wind energy advocates (European Wind Energy Association & Greenpeace) suggest that about 20% of total supply is a practical maximum, but recent experience in Germany and Denmark suggests that the level at which major inefficiencies become evident in the whole supply infrastructure is rather less than this. In WA, without any major hydro-electric capacity, the level may be lower again because gas turbines will be required to quickly compensate for deficiencies in wind. German experience has shown that even with under 10% wind contribution overall, major inefficiencies result in other sources of power because of the need to keep them on standby.	Base load renewables options are developing.

Sustainable Energy *continued*

200216374: Uranium Information Centre	5	WA needs to address the question of sustainable provision of base-load power and not simply divert attention from this by advocating "renewables". Being "globally innovative and locally responsible" (p.155) should not mean being impractical or economically irresponsible. In addition, squandering natural gas for electricity raises some ethical questions in a sustainable development context. Gas (providing 29% of WA electricity) is a very versatile energy source and chemical feedstock and our grandchildren are unlikely to thank us for using it for base-load electricity (as distinct from uranium which has no other uses - though hydrogen production is likely to become important).	The Government does not support the use of nuclear power in Western Australia.
200300953: John Boulton	1	We can improve WA sustainability by building a windmill generator at the Beldon Sewerage Treatment Plant to turn its liquid output into steam. This can then be applied to the methane collected at the Tamala Park Rubbish Tip to make Hydrogen and Carbon monoxide gases – which can be sold! $CH_4 + H_2O \rightarrow CO + 3H_2$	Noted.
200219175: City of Armadale	42	Voluntary schemes can be supported. Mandatory schemes for energy rating should be thoroughly tested to ensure that the impact on housing costs, and particularly the first time home buyer, are not excessive.	Agreed
	44	It is unclear what type of incentives would be offered, however such an approach could be supported provided any penalty on non-complying renovations were thoroughly tested.	Noted.
	46	Town planning schemes are not the appropriate mechanism for securing solar orientation for most housing situations. Most houses are built on pre-existing lots created by the WAPC under its policies rather than those under a TPS. Policies could provide some guidance to encourage solar orientation by guiding council in the exercise of its discretion where solar access criteria are met.	Planning mechanisms can support this process.
200302855: Planning Institute of Australia	53	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.	A different approach is needed for higher density developments.
200303065: City of Gosnells	47	With regard to renewable energy, funding is biased towards small scale (not profitable) and large scale projects. The medium scale, which is where local government is most likely to be able to intervene, has limited funding opportunities. This needs to be further investigated.	Noted.
200302880: City of Wanneroo	47	Financial support should be provided for research into alternative energy sources	There are existing centres in solar energy and others are planned.

Sustainable Energy *continued*

200302863: Property Council of Australia	23	Draft strategy 4.59 suggests a move away from the current energy rating tools endorsed nationally. Any new tools must be carefully considered within a national context of industry and jurisdictional acceptance of a standard framework for properties. Alternative energy rating schemes could also disadvantage WA based building contractors and suppliers. Working to a lower standard will inhibit exports to other states at the lower end of the market. Tools must also be practical or they will fail to achieve their aims.	The State Sustainability Strategy advocates the use of national standards and the development of a Sustainability Scorecard approach.
	24	The strategy states, " <i>Develop new initiatives to manage peak load demand</i> " at 4.67. However, there is no further detail. There may be an opportunity to explore options for peak load electricity generation in commercial properties. Innovative strategies have been proposed in this area.	Noted.
	25	There is a strong focus on renewable energy in the draft strategy. It states that a goal is to increase the " <i>Amount and proportion of renewable energy use in Western Australia</i> " (at page 156). This is a worthy goal, but is important to consider the total cost of achieving this goal rather than other goals. Simply to look at use is not sufficient. Any calculation of benefits and costs should consider the capital costs of renewable energy and opportunity costs (e.g. the investment that could otherwise be made in energy demand management or other strategies to conserve energy).	Agreed. Market liberalisation should help.
200302969: Jack Moore	11	4.59, 4.6.1 and 4.78. How much energy will having four star housing design, correctly orientated on the block, save?	Estimates of 15% have been made (for domestic energy).
	12	4.70 advocates renewable energy for remote locations, but we have just let contracts in Derby for diesel power. What about the tidal power scheme?	A tender was not submitted. Gas not diesel is happening for remote areas
200302968: Beverage Industry Environment Council	19	BioEnergy Policy - The BioEnergy policy should be developed in consultation with the community, industry and potential renewable energy customers.	Agreed
200302856: City of Stirling	29	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.	Agreed

Sustainable Energy *continued*

200219280: City of Swan	44	Generally agree, however the Building Code of Australia will also need to be modified to achieve the vision identified in the draft sustainability Strategy Report	Noted.
200300368: City of Kalgoorlie- Boulder	42	No mention of support mechanisms to encourage local government/industry to adopt new technology. Seems to be primarily aimed at household conservation and government procurement policy.	Noted.
	43	If the responsibility for the rating system for residential development lies with local government funding should be provided. The application of solar orientation could and should be incorporated into the Residential Design Codes. Energy efficiency for all government buildings should be mandatory not just encouraged.	This could be addressed as part of the Sustainability Scorecard.
200319175: City of Armadale	42	Voluntary schemes can be supported. Mandatory schemes for energy rating should be thoroughly tested to ensure that the impact on housing costs, and particularly the first time home buyer, are not excessive.	Agreed
	44	It is unclear what type of incentives would be offered, however such an approach could be supported provided any penalty on non-complying renovations were thoroughly tested.	Noted
	46	Town planning schemes are not the appropriate mechanism for securing solar orientation for most housing situations. Most houses are built on pre-existing lots created by the WAPC under its policies rather than those under a TPS. Policies could provide some guidance to encourage solar orientation by guiding council in the exercise of its discretion where solar access criteria are met.	The Strategy considers a number of mechanisms within the planning system that could sustainability outcomes.
200300305: Institution of Engineers	12	Sustainable pricing systems are needed for water and energy, that is policies and pricing structures that reward those who conserve and penalise those who use these resources excessively. Use of energy and water for non-essential lifestyle enhancement (i.e. home swimming pools, air conditioning systems, elaborate water features in home gardens etc) should require higher cost for those who choose this path.	Noted.
200300364: Peter Wilmot and Jan Knight	8	Sustainable Energy: The strategies listed are great. We especially like the focus on ultimately mandatory energy-efficient building codes. Much of what we see being built at present in the City of Stirling shows extreme disregard for energy conservation in design and presupposes airconditioning. For example, pseudo-Tuscan styles minimise eaves in order to cram in more units and seem to deny that we live in a hot climate.	Agreed

Sustainable Energy *continued*

200303162: R. Chapple & G. Watson, MLC's	2, p. 5	Surprisingly little emphasis on consumption patterns, since we are among the highest per-capita consumers of energy, water and products on earth.	Addressed in each of the sections
200303350: Graeme Olsen	5, pg. 16	(Section is) too short to offer more than a glimpse at each issue. Each of these large complex issues deserve better than the truncated treatments presented in the draft Strategy.	The final Strategy attempts to arrive at a balance of sufficient background information to explain the need for actions.
	6, pg. 16	Where a number of issues are discussed, they are often not placed in context, or their relative importance and applicability are not adequately explained. Major and minor issues are treated with equal gravity, and no attempt is made to set priorities.	Noted.
	7, pg. 16	Many obvious strategic questions are ignored. For example, if oil and gas are as close to becoming constrained by production as the draft Strategy and background papers predict, why is there no discussion about the continued export of large volumes of natural gas to Japan and China? Are we exporting fossil fuels at a time when they are cheap, ensuring that we run out in future at a time when they will be expensive to import	This is considered within the Interim Report of the Transport Energy Strategy Committee.
	8, pg. 16	In many areas there is a lack of analysis leading up to conclusions. Perhaps this analysis has been done elsewhere, but a summary of the logic behind each conclusion should be presented here.	This is attempted in the final Strategy.
	17, pg. 2	These sections lack breadth, failing to discuss a sufficiently wide range of options. The information presented generally follows a discernable "party line", and does not recognise or discuss alternative viewpoints where these conflict with it. This is particularly strange when dealing with topics such as energy and greenhouse, where views different from those presented in the draft Strategy are held by a large number of diverse and credible people and organisations. These are easily accessible on the Internet and in published journals and reports. For example, a laypersons guide to the range of opinions on these issues is provided by Deloitte Research (2001). To ignore alternative views completely is a subversion of the process of developing a credible sustainability strategy.	It is not possible to address every single viewpoint on every issue considered in the Strategy.

Sustainable Energy *continued*

200303092: Housing Industry Association (HIA)	p.15	<p>Actions Underway: In terms of actions underway, HIA has concerns with Western Power's policy of insisting on underground power at the time of subdivision. In rural and remote localities it is cost prohibitive to developments particularly when they involve a small number of lots, and such is not sustainable.</p> <p>Proposed Actions: 4.59 & 4.60 parts of these strategies have already been put in place.</p> <p>The State Government announced the adoption of the Building Code of Australia's Energy Efficiency Provision...</p> <p>With regard to extra incentives, the recommended strategies should be for the State Government to partner with HIA on its GreenSmart program to increase the take-up of additional measures by builders.</p> <p>HIA seeks inclusion at an early stage in the Guide to Sustainable Planning, Building and Construction, as it has demonstrated its leadership in these fields in the last 4 years under its GreenSmart program.</p> <p>4.61: The strategy as worded does not make sense, so it should be reworded. In addition, the suggestions in this measure are nonsensical. The proposal that Town planning Schemes should provide guidance on re-orientation principles as part of renovation approvals is not supported. It is inappropriate and shows a lack of understanding of approvals systems.</p> <p>As outlined in our response to 4.59 and 4.60, renovations are already included in the BCA amendment re energy efficiency (to a four star energy rating equivalent under the FirstRate modeling system). Rather than using individual TP Schemes, it is preferable as mentioned elsewhere in the draft report to introduce standard measures under Statements of Planning Policy, which are State Government managed policies and provide a consistent approach across the State.</p> <p>4.71: This cluster of strategies requires clarification. The first, 'household energy conservation information programs' does not go far enough. The last proposal 'using sustainability assessment to include life-cycle analyses on all such decisions' is far too vague and in its present form is unacceptable.</p> <p>Greenhouse gas emissions from inefficient use of energy by home occupiers is a key target area for improvement under the Strategy. The State's funding to SEDO should be considerably expanded so that it can provide more information to the public and undertake more research and undertake monitoring into effective household energy reduction initiatives.</p>	<p>Noted</p> <p>This is addressed in the final Strategy. See <i>Partnerships for action</i>.</p> <p>This will now be addressed through the Sustainability Scorecard approach.</p> <p>Noted.</p> <p>Noted.</p>
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Sustainable Energy *continued*

200303443: State Development Portfolio	166-168	<p>This section of the Strategy contains a quote from 'Lester Brown' on page 154 which asserts that world coal usage peaked in 1996. Other data conflicts with this assertion, showing continued growth in world coal consumption to 2000, with production peaking in 1998 and further probable increases. It should also be noted that comparison between the 'peaking' behaviour of petroleum production and coal production is invalid, as the physical constraints to production that apply to petroleum reservoirs are common to coal deposits. ...</p> <p>The criteria by which the sustainability of various energy sources is assessed requires clarification. It should be noted that the sustainability differences between gas and coal fuel are not inherent in their composition, but in characteristics such as thermal efficiency, sulphur dioxide emissions, etc, which change with technology improvements.</p> <p>The first objective is not clearly worded. It should be modified to refer to increasing the energy efficiency of the domestic, commercial and industrial sectors, rather than simply being part of those sectors. The reference in the second objective to "demonstrate the multiple sustainability benefits of more sustainable energy" is circular, and should be modified to simply refer to demonstration of the benefits associated with the use of sustainable energy sources.</p>	<p>This information was obtained from the World Watch series.</p> <p>Fuels have a big impact on the outcomes as well as technology. Material flows and composition can be compared on a fuel basis.</p> <p>This has been addressed in the final Strategy.</p>
	170	The recommendations of the report of the Electricity Reform Task Force (ERTF) regarding managing peak load demand for electricity should be noted, particularly with respect to the use of compensation/incentives for accepting reductions/interruptions to electricity supply via the Residual Trading Market. Strategies for managing peak loads should be developed in consultation with electricity retailers in the new market structure resulting from the implementation of the ERTF recommendations.	This is reflected in the final Strategy.
	171	The Strategy could possibly recommend that the Sustainable Energy Development Office investigate the circumstances necessary to introduce variable rate charging as a means of reducing peak demand and encouraging renewables.	Noted

Sustainable Energy *continued*

200303443: State Development Portfolio	172-173	<p>It should be noted that the proposed actions regarding renewable energy and distributed generation are covered by the Electricity Reform process described above and should therefore be removed from the Strategy to avoid confusion. Similar comments can be applied to the proposed actions for meeting Mandatory Renewable Energy Targets as this option is being investigated in the Electricity Reform process, but is subject to a further decision on its viability. The Strategy should defer to the outcome of this decision.</p> <p>The reference to minimising energy use by using sustainability assessment to include life cycle costing analyses on all such decisions is unclear. It needs to make clear what processes will be utilised and to consider how readily such information can be ascertained.</p>	Noted.
200300363: Ecotech Architects	Page 2, last 2 paras	<p>There is a tendency for the document not to define the role of passive, active use of solar energy in a sunny state like WA. There are enormous industrial and professional opportunities for the export market if there was a more defining proactive approach for promoting solar energy development and use. Perth has a very important role in this field in the first half of the 21st Century.</p> <p>I recognize that it is covered briefly, but the setting of targets of 25% use over the next 30 years, would be welcomed and would set a global benchmark for other countries to the north of us to emulate. The document needs greater focus and emphasis in this area.</p>	Noted
200302729: Shire of Serpentine- Jarrahdale	10, pg. 15	The vision should contain a numerical target for energy reduction in consumption and emissions reduction of greenhouse gases.	This would need to be considered in the development of the Western Australian Greenhouse Strategy.
	1, pg. 16	<p><i>Proposed Actions</i></p> <p>*Support the development of more regional energy and greenhouse coordinators such as the south east regional energy coordinator. This allows for efficient use of resources and a community approach addressing regional issues of energy consumption.</p> <p>*A commercial building energy rating system needs to be implemented, similar to system implemented in NSW by SEDA.</p>	Noted.

Sustainable Energy *continued*

200301135: Premier Coal	5-6, p.1, 1-8, p.2	<p>It is commonly perceived that Sustainable Energy means renewable energy. Unfortunately, Page 154 paragraph 3 of the Draft Strategy appears to perpetuate this thinking:</p> <p><i>The need for sustainable energy is about the transition from fossil fuels to renewable energy sources, including wind, waves, solar photo-voltaic, solar thermal (solar water heaters), geothermal and various biomass based fuels, (such as biodiesel).</i></p> <p>Sustainable energy is not just about the transition from fossil fuels to renewable energy sources, particularly over the next 30-50 years. Renewables are undeniably priority energy resources for consideration, support and development but such a statement promotes an unrealistic expectation and is unbalanced with the need for sustainable energy delivery. As it stands, the Strategy text on Sustainability is potentially confusing and misleading as it does not put the renewable aspirations into context. Again, renewable energy is highly desirable but is not equivalent to Sustainable Energy – at least not in the foreseeable future. Already there is a common perception that society can change to renewables overnight and this is politically, socially and economically damaging. To help redress this, the WA State Sustainability Strategy must better define what Sustainable Energy is and the expected time frames required for technology transitions. Premier Coal believes the Objectives of the Sustainability Energy Strategy should include an education component such that wise government energy sustainability decisions can be made for an informed society without fear of political backlash. As well, the Objectives should spell out that the State wants economic and reliable energy with the least environmental impact to achieve these requirements.</p> <p>Delivery of Sustainable Energy absolutely requires the elements of Reliability (continuity of supply – day in, day out, 24 hours per day), Efficiency (minimum of waste), Resilience (ability to recover from disturbance and resume normal delivery) and Adaptability (taking advantages of improvements and new possibilities). Not all energy sources provide this.</p> <p>Efficiency and Adaptability are covered in the Draft Vision and Objectives but Reliability and Resilience are missing. These factors must be emphasised in the State's Strategy such that a balanced approach to energy sources is maintained to ensure sustainability of supply. ...</p> <p>Without Reliability and Resilience, there will not be sustainable energy supplies in Western Australia.</p> <p>Action 4.66: Premier Coal notes the proposed Bioenergy Policy but suggests a more fundamental issue is the development of a State Energy Policy.</p> <p>Action 4.68: One of the most effective ways to reduce line losses is to develop industry near the generation facilities. Encouragement of Industry close to the Collie and Muja Power Stations will provide a significant efficiency, hence greenhouse, improvement.</p>	<p>The Strategy emphasises transitionary processes.</p> <p>State energy policy is being developed as part of market liberalisation process.</p>
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Sustainable Energy *continued*

200301135: Premier Coal	1-2, p.3	<p>Action 4.71: Premier Coal strongly advocates the use of life-cycle analyses but notes that this is very much open to abuse as published information is often limited, not applicable, misleading or incorrect. A generic approach is fraught with danger. Western Australian specific information should be used in any life-cycle comparison as this State has significant differences with a methane free, clean coal and large transport distances for gas. Independent life-cycle assessment for coal and gas in WA power generation has shown similar greenhouse intensities.</p> <p>As fossil fuels are a vital part of the WA economy and social fabric, Premier Coal would suggest an additional action plan:</p> <ul style="list-style-type: none"> • Support the use of fossil fuels while they are essential to sustainable energy supplies and where they have clearly improving efficiencies and reducing greenhouse impacts. 	Noted.
200302774: Waste Management Association		Waste management has an important role to play in sustainable energy production. The current use of waste oils for energy generation and the use of components of the municipal and other waste streams for electricity production are examples of such production.	Noted.
		<p>This action should be changed to include consultation in development of the policy:</p> <ul style="list-style-type: none"> – <i>Develop a State BioEnergy Policy in consultation with industry and the community.</i> 	This would involve public consultation.
		<p>We consider that one of the action plans should address encouragement of new renewable energy technologies. We propose that the following actions should be added:</p> <ul style="list-style-type: none"> – <i>Encourage new technologies for the generation of renewable energy.</i> – <i>Classify re-refined oil as a renewable energy source and promote refined oil as a renewable energy source consistent with the MRET and the Renewable Energy Regulations.</i> 	Noted.

Sustainable Energy *continued*

200303590: WA Collaboration	Rec. 46	Energy Key challenges include making greater use of renewable and energy efficient technologies, appliances and practices, and reducing our energy consumption per capita. The State Government should <ul style="list-style-type: none"> ▪ include requirements on energy efficiency and use of renewable energy in the building code (for example, passive solar utilisation, insulation, appliances, compulsory energy rating); and ▪ develop innovative financing solutions for energy efficient and renewable energy appliances (such as leasing schemes, sharing of costs and benefits between landlords and tenants, low interest loans). 	Agreed. This would be addressed through the Sustainability Scorecard. Existing rebate schemes are already provided through SEDO and Water Corporation (to save water and energy).
200303354: Western Power Corporation	6	A sector that requires more comprehensive consideration is energy. Energy, in all its forms, is a key to development and a State sustainability strategy should consider all energy resources and forms available to the State and the social, environmental and economic implications of their use. It seems uncoordinated, therefore, to see reference to a bioenergy policy in the absence of a more strategic energy policy.	Noted. All Energy Policy subject to Electricity Reform at present.
200303076: WA Sustainable Energy Association (WA SEA)	7, p.10	Strategies 4.59 & 4.60 need updating to reflect compulsory 4* BCA rating by mid-2003; consideration needs to be given to extending requirements to apartment buildings and renovations, and progressively increasing minimum standards to 5* and beyond	These would be addressed as part of the Sustainability Scorecard.
200300358: F. Schnattler	67	Ensure Town Planning Schemes require active (solar hot water system, ...) and passive solar technologies (solar access, ...) to be applied in new developments to 100 per cent of homes by the beginning of 2004.	These would be addressed as part of the Sustainability Scorecard.
	67	Continue improving innovations in transport fuels including biodiesel, gas, hydrogen fuel cells, gravity energy and nuclear power. Start with state-wide pilot projects progressively.	Noted.

Sustainable Energy *continued*

200303076: WA Sustainable Energy Association (WA SEA)	p.11 and p.12	<p>4.61: This strategy needs to also include the fact that new homes must be north facing. Considering design constraints like the orientation of existing streets where some new developments will occur, WA SEA is doubtful that 80% orientation is achievable, with 70% being best if hopeful.</p> <p>4.62: Change wording from '<i>Encourage</i>' to '<i>Require</i>'.</p> <p>4.63: Eco-Loans should encompass the installation of Solar Hot Water Heaters on roofs.</p> <p>4.64: Leadership is not demonstrated through planning but through actions. WA SEA recommends this Strategy be reworded to read '<i>Demonstrate government leadership in sustainable energy through developing, implementing and publicizing results of Sustainability Action Plans</i>'</p> <p>4.66: Ensure that any policy developed provides clear guidelines as how to deal with the project approval process, planning issues and conflict management. In addition, an overarching renewable energy policy needs to be developed with further policy developed for wind energy</p> <p>4.67: This can be addressed by installing smart meters/timers. All new and replacement meters should be smart metres. In addition, make people aware of how much energy they are using. Make energy use visual by locating meters or indicators in prominent positions.</p> <p>4.68: This should be reworded to read '<i>Develop and implement mechanisms in the electricity market structure for encouraging renewable energy etc...</i></p> <p>4.69: WA is required, under Federal Government's MRET legislation, to develop some 250MW of renewable energy by the year 2010 - if WA does not construct this capacity it will be built on the eastern seaboard and WA tax payers will foot the bill (to the tune of some \$650M). This further supports the need for a workable renewable energy access regime the private sector will not be able to leverage the opportunities afforded to it by the Federal Governments MRET legislation. As a consequence, jobs and opportunities for greenhouse gas reductions will leave the State.</p>	<p>High rates are achievable as not all homes need to be north facing to gain solar advantage, especially in high density areas.</p> <p>Encourage is appropriate at this stage. Agreed.</p> <p>This is implied.</p> <p>The final Strategy includes reference to the development of a Renewable Energy Policy.</p> <p>Noted.</p> <p>The action has been amended in the final Strategy.</p> <p>Noted.</p>
	1, p.13	Also include in this section: " <i>The establishment of the WA Sustainable Energy Association as the peak industry body for renewable energy and energy efficiency with a target that 30% of the State's fossil fuel use is displaced by sustainable energy practices by 2010.</i> "	This is not an action undertaken by the Government.

Sustainable Energy *continued*

200303076: WA SEA	p.16	<p>WA SEA recommends that the additional measurements be included in the Energy section. (Page 156)</p> <ul style="list-style-type: none"> • Number of ORER accredited renewable energy projects in WA • GWh of renewable energy purchased by Government departments • Measured greenhouse gas emission reductions on WA • Greenhouse intensity of an economy 	All indicators and targets have been removed from the final Strategy.
	p.17	WA SEA believes that Albany is not a good example as this wind project uses overseas technology. A better example may be the activities of local manufactures	Noted.
	p.17	In addition, WA SEA believes that using Tafe expertise, WA is well placed to become a global leader in sustainable energy solutions and training. (Page 156)	Agreed.
200303354: Western Power Corporation	15	<p>The general thrust of this section relates to:</p> <ul style="list-style-type: none"> • improved "built in" end use energy efficiency and end user education; and • improved utilisation of renewable / alternative energy sources. <p>While these are essential elements in improved energy sustainability, their capacity alone to achieve substantial movement in the next decade is limited. As indicated above, an over-arching State energy policy could allow the development of workable strategies involving a wider spectrum of energy resources that could see a more significant, ordered improvement over the short and medium terms. For example, while appropriately designed electricity market mechanisms may be able to provide incentives to reduce line losses (4.68), it could be more practicable to consider policies that encourage industrial development close to energy sources.</p>	Agreed. On-going work required on Energy Policy.
	17	Another observation under this section of the draft Strategy, and relating to the Sustainability Assessment capabilities discussed in Chapter 3, is the importance of the development of authoritative, independent and verifiable criteria, methodologies and factors for the estimation of sustainability impacts (eg life cycle costing and analysis). These are presently open to a diversity of applications with significantly different outcomes. An important element of a State Sustainability Strategy is the establishment and Government endorsement of these criteria and methods to underpin a consistent approach by business, the community and Government itself.	Agreed. On-going work required.

Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place'

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200300363: Eastern Metropolitan Regional Council	91	Support for the development of Regional Sustainability Strategies (Action 4.72), as previously noted, has significant resource and cost implications for the EMRC. It is likely that Regional Councils and Local Governments would need to engage specialist expertise in areas related to culture and heritage.	The emphasis in the final Strategy is placed on developing a methodology for Regional Sustainability Strategies prior to their further development.
	92	Encouraging Local Government's implementation of heritage to be consistent, transparent and builds on existing plans and character, whilst allowing for sympathetic infill (Action 4.73) is supported. At present, there are varying levels of protection, confusion on responsibilities and criteria for heritage buildings and there is a need for a consistent and commonly agreed framework.	Noted.
	93	Initiatives to provide learning opportunities (Action 4.74), support Indigenous communities (Action 4.75) and the development of a Built Environment Policy (Action 4.76) and Creative city Policy (Action 4.77) are generally supported.	Noted
200300359: Bernard Bischoff	7	Education and Community Awareness - The Planned Bunbury Regional Museum. Education and community awareness needs to be promoted in all sorts of innovative and traditional ways. Threats of terrorism should not detract from the need for sustainability.	Noted.
	8	I would like serious consideration be given to the visual presentation of examples of the damage man has done to the WA environment in museums and other exhibitions. For too long the facts have been glossed over or avoided altogether.	This is being done increasingly.
	8	The planned Bunbury Regional Museum may offer opportunities in this respect, although there has been a recent push (from unknown directions) to establish a Museum of Social History instead of a General Regional Museum that could also deal with the beauty and more unfortunate aspects of the natural environment. Bunbury being the regional centre has greatly benefited from the produce of the hinterland. It should accept that some of the projects and practices of the past have proven not to be sustainable. We have to wait and see whether it is mature enough.	Perhaps a sustainability approach can incorporate it all in an integrated way.
200219280: City of Swan	39	Grossly inadequate	Noted.

Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200300142: Office of Multicultural Interests	3	Using gender as a tool with which to appraise where, what, which and how services are provided is currently accepted as an effective means of determining whether service delivery models are inclusive and representative. In a similar vein, ethnicity also offers alternative insights about a range of issues in the public domain: community, heritage, health, housing and education. Devoting a separate chapter to multiculturalism appears to suggest that diversity supplements the Sustainability Strategy, rather than issues of diversity such as gender being intrinsic to the development of the various facets of the Strategy. Placing issues of diversity and multiculturalism at the periphery results in particular conceptual anomalies evident in the Consultation Draft. I refer to Chapter 6 – Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' to illustrate how assumptions about who are Western Australians affirm homogeneity of values, aspirations and expectations. Chapter 6 notes that "Western Australians have ...a strong sense of local identity" and that "...there has been an erosion of the very values that informed these views, as the impacts of the western-style development have manifested".	Noted. Section added on gender Separate section can denote importance too.
	4	My queries relate to the assumptions and values that underpin these statements. In short whose aspirations, values and emotional needs shape the "symbolic" value ascribed to "this place"? how and why do people develop a sense of attachment to the State, and does such a sense of attachment include those who have arrived in more recent times, and whose experiences of the land and the coast differ. What steps, if any, are being taken to ensure that recently arrived migrants either those who are disillusioned with "western-style developments" or those who aspire to such developments acquire a sense of attachment to this place when such a notion appears to be pivotal to Western Australian identity.	'Difference' and shared values are both needed.
200300362: The Wildflower Society of WA Inc.	11	The section beginning on page 157 "Preserving cultural heritage, landscape and creating a 'sense of place'" needs greater reference to landscape in the whole section. We recommend the use of local native plants in gardens and parks in the built environment, on both private and publicly owned land. These plants should also be used in rural areas and on farms to preserve local landscape heritage and thus a 'sense of place'.	A section on Sustainable urban design has been added to incorporate this idea.
200302959: City of Fremantle	43	Proposed action 4.76 appears to be too generic and resources may be better spent encouraging local government's to develop their own specific built environment policies and scheme controls rather than generic Western Australian state level controls.	An overall policy framework for the built environment is desirable.

Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200302959: City of Fremantle	44	The cost of restoring and maintaining heritage buildings is often raised from building owners and through this strategy, the state government should examine and propose a series of subsidies, grants and tax incentives which aim to achieve the required protection, restoration and maintenance of such buildings.	Many exist and restoration of many private homes and other buildings and has occurred without further assistance.
	45	The target for this section is again very limited in its scope. The indicators and targets could include dollars spent on and the number of festivals or artworks produced per year and should include some timeline for achievement.	All targets and indicators have been removed from the final Strategy.
200302855: Planning Institute of Australia	54	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.	Noted.
200303065: City of Gosnells	48	Local governments need greater powers to protect places of local heritage significance, which are by their nature (i.e. not of State significance) not provided with statutory protection under the Heritage of Western Australia Act 1990. As these places are demolished or destroyed, there is an incremental erosion of the feeling of 'sense of place'.	Local governments have power to refuse demolition.
200302863: Property Council of Australia	19	There is no consideration given to who will fund the heritage preservation to deliver heritage benefits to the community. After having failed to properly consider the costs of heritage preservation, the paper states that the indicator of success should be the " <i>Number of town planning schemes with zones and guidelines for cultural heritage and landscapes</i> " (at page 159). Nowhere does the paper consider who bears the burden of the cost of owning and maintaining heritage properties.	All indicators and targets have been removed from the final Strategy.
200300400: Nancy Victorin-Vangerud	15	In reflecting today about a "sense of place", I believe we can find much inspiration in our community value of coastal living, which honours together both land and sea, landscape and seascape, land rights and sea rights, care of the land and care of the sea. In committing our state to a sustainability strategy, we need to do more than "think like a mountain", to invoke Aldo Leopold's famous vision. We also need to "think like the sea". We need a sea-ethic for sustainable living, and as I would like to explore much further with any of you, a sea-spirituality. Thank you.	Noted

Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200301473: North Lake Residents Association	2 3	Many people are filled with awe and respect when they view the Australianess of such places as the Beeliar Wetlands. This is partly because its simplicity suggests there is so much more to it than meets the eye. Its complexities, its flora and fauna, its aesthetic qualities, its links with indigenous culture and its value as public amenity for physical and psychological recreation are only just beginning to be understood... This area is currently under threat from a proposed extension of the Roe Highway stage 8.	Noted.
200302856: City of Stirling	31	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.	Noted.
200219280: City of Swan	45	Grossly inadequate.	
200300368: City of Kalgoorlie- Boulder	44	The review and implementation of town planning schemes rests with the local government. To ensure retention of heritage places there needs to be flexibility and an innovative approach to assessing proposals for redevelopment of heritage places. Therefore economic considerations need to be accounted for and a sustainability approach to heritage preservation, conserving environment, social and economic factors would have many benefits. The Built Environment Policy should ensure flexibility to ensure that the built environment can adapt to the changes and evolution of 'sense of place'. The Built Environment Policy would have more benefits if adopted under the Town Planning Scheme than through the Heritage Council as the Heritage Act would then need to be amended to include non State Registered places.	This could be considered as part of the development of the Built Environment Policy.
200319175: City of Armadale	48	These actions would help the City meet its goals for greenhouse gas emissions as adopted under the Cities for Climate Protection Program.	Noted
	50	Noted and supported	

Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200217802: Heritage Council of WA	2, p.1, p.2	<p>The 'In-Short' section on page 159 omits many of the most important issues and strategies, and some of the terminology used isn't accurate. For your consideration, we've suggested a rewording for this section.</p> <p>Heading CONSERVING CULTURAL HERITAGE PLACES AND AREAS, AND ENHANCING A 'SENSE OF PLACE'</p> <p>Vision That Western Australia's built heritage and special qualities of place are valued and enhanced in all development.</p> <p>Objective Create a quality built environment in Western Australia through the conservation of cultural heritage and the active development of quality public spaces.</p> <p>Actions underway include</p> <ul style="list-style-type: none"> • Accelerated compilation of the State Heritage Register • Protection of heritage places by Local Governments through municipal inventories and town planning schemes • Area-based conservation such as that achieved in the West End in Fremantle • Active involvement of State and Local Governments in public spaces and community art in city centres (<i>through which program?</i>) • Community-based programs such as the development of a multi-media laboratory by members of the Kojonup community. 	Most of these suggested changes are reflected in the final Strategy.
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Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200217802: Heritage Council of WA	p.2 cont.	<p>For your consideration, we've suggested a rewording for this section.</p> <p>Proposed actions</p> <ul style="list-style-type: none"> i. Prepare a Heritage-based tourism, economic and social development strategy for WA; ii. Improve knowledge of the condition of the State's heritage by periodic survey work coordinated by the Heritage Council and local governments. iii. Improve legislative protection of the State's built heritage by making the Heritage Act up-to-date and effective; iv. Require that Regional Development Commissions commit to sustainability objectives (<u>including</u> cultural heritage conservation) in their grant aid and other programs; v. Improve the standards of local government heritage protection with reference to best practice, including best practice in guidance of infill and redevelopment in heritage areas. vi. Increase the amount of grant aid available to heritage conservation projects on the grounds of the sustainability benefits (given that the funds available in the Council and Lotteries Commission grant programs are very small); vii. Lead by example in the conservation of Government-owned heritage assets; viii. Promoting a wider appreciation of the value of cultural heritage, including knowledge of the economic benefits of heritage conservation. ix. Support opportunities for indigenous people to promote cultural awareness within their own communities. x. Develop a Built Environment Policy that focuses attention on Western Australia's architectural features and promotes quality architecture that enhances our 'sense of place'. xi. Make heritage conservation an important issue in major planning policies or reviews, such as the <i>Future Perth</i> project. xii. Develop a Creative City Policy as part of Future Perth to ensure that community values are expressed creatively in the city centre and other centres. 	As above.
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Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200217802: Heritage Council of WA	p.2 cont.	<p>For your consideration, we've suggested a rewording for this section.</p> <p>Proposed actions</p> <ul style="list-style-type: none"> xiii. Prepare a Heritage-based tourism, economic and social development strategy for WA; xiv. Improve knowledge of the condition of the State's heritage by periodic survey work coordinated by the Heritage Council and local governments. xv. Improve legislative protection of the State's built heritage by making the Heritage Act up-to-date and effective; xvi. Require that Regional Development Commissions commit to sustainability objectives (<u>including</u> cultural heritage conservation) in their grant aid and other programs; xvii. Improve the standards of local government heritage protection with reference to best practice, including best practice in guidance of infill and redevelopment in heritage areas. xviii. Increase the amount of grant aid available to heritage conservation projects on the grounds of the sustainability benefits (given that the funds available in the Council and Lotteries Commission grant programs are very small); xix. Lead by example in the conservation of Government-owned heritage assets; xx. Promoting a wider appreciation of the value of cultural heritage, including knowledge of the economic benefits of heritage conservation. xxi. Support opportunities for indigenous people to promote cultural awareness within their own communities. xxii. Develop a Built Environment Policy that focuses attention on Western Australia's architectural features and promotes quality architecture that enhances our 'sense of place'. xxiii. Make heritage conservation an important issue in major planning policies or reviews, such as the <i>Future Perth</i> project. xxiv. Develop a Creative City Policy as part of Future Perth to ensure that community values are expressed creatively in the city centre and other centres. 	As above.
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Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200217802: Heritage Council of WA	p.3	<p>For your consideration, we've suggested a rewording for this section.</p> <p><i>Indicators and targets</i></p> <ul style="list-style-type: none"> • Extent to which the State Register is comprehensive • Extent to which town planning schemes contain heritage provisions in accordance with the Model Scheme Text, and give protection to a comprehensive inventory of places and areas. • Extent to which heritage places are in sound condition and are not demolished 	All indicators and targets have been removed from the final Strategy.
200303159: Network of Aboriginal Language Centres	1	The sustainability of indigenous language, culture and knowledge is a priority amongst indigenous communities who are employing a number of strategies to achieve this aim. The State Sustainability Strategy refers to the sustainability of cultural heritage yet does not specifically mention indigenous languages. The Australia State of the Environment Report (2001, p.1) states that language is 'one of the most significant aspects of the cultural heritage of any group' (Australia State of the Environment Report 2001, p.1), and we therefore call on the WA Government to recognise the importance of indigenous languages to all Australians and support communities working towards their sustainability.	Agreed
200303443: State Development Portfolio	176	As a general point in relation to this section, it is felt that there is a need to address the issues in relation to the elderly and more vulnerable segments of the population, as they will have quite specific needs in terms of safety, service provision, etc that also contribute towards the sense of place concept.	Agreed
200303312: Department of Conservation and Land Management (CALM)	Page 12, para 3	This section recognises the importance of maintaining natural areas in urban centres to ensure a 'sense of place' in the community. While the draft Strategy is committed to the implementation of Bush Forever (strategy 4.5), there is no recognition within the Strategy of the important role that regional parks play in urban areas. Regional parks are areas of regional open space that are identified as having conservation, landscape and recreation values, and are valued strongly by the community for these reasons. The Perth metropolitan area currently has eight regional parks, where this Department coordinates the management. The State Sustainability Strategy should acknowledge the importance of these natural areas, and commit to extending existing, or creating new, regional parks in urban areas of the State.	The final Strategy has a new section that addresses this topic. See <i>Sustainable urban design</i> .

Preserving Cultural Heritage, Landscapes and Creating 'Sense of Place' *continued*

200302729: Shire of Serpentine- Jarrahdale	3, pg. 16	Action 4.74 This should be expanded to all members of a local community. It is important that all members understand their areas heritage and are engaged in understanding and protecting it.	Agreed
200300358: F. Schnattler	68	Support opportunities for all communities to promote cultural awareness within their own communities.	This is the approach adopted.
200304006: City of Perth	7	Whilst the fundamental principles being applied are sound, there are issues that should be addressed in the heritage section of the Strategy. Consistency in addressing cultural heritage needs improvement, that is, the vision does not mention cultural heritage, yet it is mentioned in both the objectives and the actions.	The whole section is devoted to cultural heritage and sense of place.
	8	As is the case with a number of proposed actions within the Strategy, the proposed heritage actions contain words such as 'support' and 'encourage' however, little indication is given as to who will be doing these things and how they will be costed. For example, 4.72 Support Regional Sustainability Strategies as opportunities to develop 'sense of place' stories.	Responsibilities are allocated in the final State Sustainability Strategy.

Building Sustainably

CIB #	Submission paragraph/ page #	Paragraph Text	Response
200219471: Town of Cambridge	8	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.	Noted
200300363: Eastern Metropolitan Regional Council	71	Promotion of a voluntary 4 star energy rating on all new homes (Action 4.78) is supported, however, it is recommended that the 4 star energy rating system is not promoted as a voluntary exercise. A stronger level of commitment and approach should be adopted as has occurred in a number of other eastern states, where a minimum star rating is required before a house can be sold.	The Sustainability Scorecard could support this.
	72	The development and implementation of a Sustainable Planning, Building and Construction Guide through the State-Local Government Sustainability Roundtable (Action 4.79) and relevant State Government documents (Action 4.80) is strongly supported and some progress in this area is already occurring through the Building Codes of Australia and the Housing Industry Association.	Noted
	73	The development of incentives for sustainable building and construction including renovation (Action 4.80) is supported and is a key issue for Local Government through the planning and development application process. This issue should involve consultation with Local Government to identify the most practical ways to implement and administer this initiative.	Agreed
200219416: City of Belmont	14	Sustainable housing design and construction guidelines should be developed by the state in close collaboration with local governments. However, issues of practicability and affordability should not be ignored if the community is to be supportive.	Agreed
200302959: City of Fremantle	46	Proposed action 4.8 raises the issues that numerous documents that guide planning and construction need to be combined and reduced to a one stop guide. The development of this one stop guide should also incorporate the housing industry views... include examples and case studies where possible and if needs be, develop and monitor trials and case studies in different climatic regions. This initiative is viewed as a critical step in achieving in sustainability in the urban environment and is supported by the City of Fremantle.	Agreed

Building Sustainably *continued*

200302863: Property Council of Australia	26	Draft strategy 4.79 proposes a guide developed in consultation with industry stakeholders. There is a definite need for information on sustainable building practices aimed at the planning, development and construction sectors. However, it is not clear what building types are being referred to by these actions. Moreover, there is no mention of incorporating existing tools into a broader framework dealing with sustainability. Any Sustainable Planning, Building and Construction Guide should make specific mention of examining the range of programs and tools in use nationally and internationally to assess their applicability for the Western Australian circumstances.	Agreed
200302856 City of Stirling	33	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.	A new section has been created in the final Strategy on <i>Sustainable urban design</i> .
200219280: City of Swan	40	Generally agree, however the Building Code of Australia will also need to be modified to achieve the vision identified in the draft sustainability Strategy Report.	Noted.
200300261: City of Albany	9	There is an identifiable push to more sustainable outcomes as is illustrated in the new energy efficient controls that are to be adopted for the Building Codes on the 1 st July 2003 and the new Residential Design Codes (which place increased emphasis on sustainability through incorporating provisions that influence built form and the way that buildings and hence people relate to each other). The Strategy should build upon the foundation that has been created by these documents.	Agreed
200300368: City of Kalgoorlie-Boulder	45	In order to bring about change in the building industry to ensure that maximise renewable energy is available to and utilised by new constructions, financial rewards and support will need to be higher priority than regulation. The recycling of building material, be it in another construction or recycled to create a new product needs to be fully supported, to ensure minimal wastage of materials from construction sites.	Agreed

Building Sustainably *continued*

200300368: City of Kalgoorlie- Boulder	46	The production of the Sustainable Construction Guide is considered important, as it will be able to collate the relevant sections of the various documents into a useable formant for the general community. A variety of building materials should be encouraged through incentives.	Agreed
200319175: City of Armadale	52	Noted and supported – voluntary schemes should be supported	Agreed
	56	As with comment on 4.59, the incorporation of additional standards needs to be undertaken with care to avoid excessive impacts on housing affordability.	Agreed
200306829: Phillip Calais	3, p. 8	On page 26, S4.95, pp. 217, S4.95 and elsewhere, it is stated that “The Government will: (4.95) Promote a voluntary 4 star energy rating on all new homes and begin developing a more....” Voluntary standards just do not work. It either needs to be mandatory or else just don’t bother. If voluntary standards are desired, then why not just introduce voluntary road speed limits? I’m sure everyone will obey voluntary and non-mandatory 50 km/hr speed limits.	Voluntary approaches enable innovation and we are still in that phase. The Sustainability Scorecard may support this approach.
200303443: State Development Portfolio	178	The initial diagram in this section (Figure 10 p.165) does not provide a clear explanation of the relationships associated with the inter-connection of community, government and the market. It appears to give equal weighting to all three components. There are other models that show the community as including markets, and markets as including government. The discussion within this section should explain the reason for the model and highlight its contribution to the document. ...	The overlaps are meant to demonstrate the complexity.
200300358: F. Schnattler	69	Vision and realise acts, regulations, codes of practice, and help notes that mandate at least a 4-star energy rating system on all new buildings through community-transparent processes by the end of 2005.	See the proposal for the Sustainability Scorecard.
	69	Vision and realise a BEvolution Building, Construction and Planning Data and Information Base on the Internet in close and transparent consultation with all relevant stakeholders by the end of 2005. Provide public access to this electronic Data and Information Base.	Guide to be developed.
200303590: WA Collaboration	Rec. 41	Housing and planning The State Government should expand the current range of incentives for environmentally sustainable housing. Incentives should be provided to encourage sustainable outcomes from housing developments, redevelopments and house renovations, for example, energy efficient appliances, environmentally preferred building materials, solar orientation.	Noted. Sustainability Scorecard will provide integrated approach to these matters.

Building Sustainably *continued*

200303076: WA Sustainable Energy Association (WA SEA)	7, p.9	Action 4.78: This action is outdated	Agreed.
200303161: William (Bill) Grace	18	Recent developments heralded by the government as Greensmart suburbs are in reality minimalist with respect to sustainability improvements, and are (laudable) initiatives of the industry rather than the government	Agreed
	21	<p>Building: As the ESD consultant for the South Atwell Primary School project, and the designer of environmentally designed homes, I am aware (and share some) of the concerns of the housing industry in relation to energy ratings for homes. However there is no over-riding impediment to the introduction of a home energy rating system. The final Strategy should require the introduction of such a system for both new homes and renovations – suggested wording:</p> <p>Following consultation with industry stakeholders, develop and phase in a mandatory home energy rating system for all new homes, and for significant renovations of existing homes.</p> <p>The draft Strategy also calls for the development of a Sustainable Planning, Building and Construction Guide but doesn't clarify:</p> <ul style="list-style-type: none"> • how the planning component of this will relate to Liveable Neighbourhoods. • the scope of the document with respect to energy, water, materials etc <p>This needs attention in the final Strategy.</p> <p>This section should also recognise:</p> <ul style="list-style-type: none"> • the development of the Australian Building Environmental Rating Scheme (NABERS) being developed by Environment Australia, and • the Australian Greenhouse Ratings Scheme now implemented by the Australian Greenhouse Office and SEDO locally. <p>I would be happy to provide some text on these initiatives if required.</p>	Agreed. This should be addressed by the Sustainability Scorecard.
200303092: Housing Industry Association (HIA)	3, p.16	<p>The Objective should be expanded to state:</p> <p><i>"Encourage the widespread adoption of sustainable building and construction through promotion and training of industry and encouraging the uptake of such practices from the public."</i></p>	

Building Sustainably *continued*

200303092: Housing Industry Association (HIA)	p.16	<p>Proposed Actions</p> <p>4.78: This recommendation should be expanded to include the requirement for all housing to achieve a four-star energy rating at the point of sale. As discussed previously, this action is implicit in the BCA energy efficiency amendment which becomes mandatory for housing (including extensions) in July 2003.</p> <p>4.79: The recommendation to develop a Guideline should be revised so that it includes HIA participation in its formulation. Any such Guide should recognise and incorporate existing guides such as the "Your Home" Technical Manual (Environment Australia).</p> <p>4.80: This recommendation should be reworded to include existing actions underway by HIA's GreenSmart programme, the Australian Building Codes Board drafts on sustainable building and other such existing actions. There is a need to avoid duplication of effort and to send a single, clear message to all stakeholders regarding sustainable design and construction of housing, commercial and industrial buildings.</p> <p>4.81: This recommendation should be expanded. The incentives for sustainable building and construction offered by the State Government are too small and are ineffective. HIA seeks discussion with Government on additional assistance to industry to promote sustainable practices.</p>	Noted
200302729: Shire of Serpentine- Jarrahdale	4, pg. 16	<p><i>Objectives</i></p> <p>Integrate sustainable building and construction requirements into state and local planning policies.</p>	Noted
	5, pg. 16	Action 4.78 What system is being used to do star ratings? The NSW Naters system has been unsuccessful and had many implementation problems, it is also a measure of thermal efficiency as opposed to energy efficiency.	Noted.
	6, pg. 16	Action 4.79 the preparation of the guidelines should identify areas and issues that will require different implementation methods including legislation, policies, guidelines, education and financial incentives. These should then be implemented.	Agreed
	7, pg. 16	Review the work in this area being undertaken by the NSW Sustainable Advisory Council, it is appropriate to what WA is trying to achieve and their knowledge would be valuable.	Agreed
	8, pg. 16	Action 4.82 Should be expanded to include the removal of financial and institutional barriers.	Agreed

Building Sustainably *continued*

200302729: Shire of Serpentine- Jarrahdale	9, pg. 16	<i>Indicators and Targets</i> Legislation implemented Policies Implemented	All indicators and targets have been removed from the final Strategy.
200303738: Royal Australian Institute of Architects	10	The RAIA believes that stricter controls are required in the building construction industry if outcomes are to be improved. For example: <ul style="list-style-type: none">• The majority of building industry personnel/trades are not qualified in the area in which they are working. (A recent paper considered by the building Construction Industry Training Council indicated that in many trades only 20% of personnel are qualified)• There are almost no mechanisms for enforcing building regulations and codes in WA other than by litigation.• Only plumbers, electricians, builders and painters need to be licensed to use the title of architect requires registration, but anyone is permitted to design	Noted.

Building Sustainably *continued*

<p>200303738: Royal Australian Institute of Architects</p>	<p>Pg. 4</p>	<p>Hindrances</p> <ul style="list-style-type: none"> • A current tax system which penalises building sustainability, especially commercially • Inefficient (un-sustainable) buildings with high running costs involve lower capital outlay (benefit for developers) coupled with tax deductible high running costs: eg for air conditioning and maintenance, (benefit of owner) • Good design, quality materials and workmanship towards sustainable building may increase initial capital costs over lowest standards but is not tax deductible. This equates to a tax penalty on good design. • Conservatism of the building industry overall and resistance to change. • People like to do today what they did yesterday, and in the same way, without substantial change. Homo sapiens is, by and large, resistant to having to think about each task. Habit is easier. • Contractors are wary of novelty which is perceived as a financial risk • However, the RAIA believes that business wants sustainable building to generate improved profitability • There are fears that new systems and/or regulations for sustainable building will slow the development process, thereby increasing costs • The building Industry in Australia is almost entirely deregulated • Subcontracting has distanced actual workers from licensed builder and project owners • The market focus on minimising costs has comprised all other considerations and fostered intense cost-based competition in the Building Industry. "Never mind the quality, feel the width". This makes genuine innovation in planning, design and construction of development and buildings appear difficult and dangerous • The creativity and skill of the architect in designing sustainable human environments and buildings may be constrained by the demands of the client, which must therefore be guided by the community through leadership, research and development, supported by Government policy and incentives. 	<p>These could to be considered as part of the Built Environment Policy and also the development of the Sustainability Scorecard.</p>
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