

16 July 2024

Written submission urbanpolicyinput@infrastructure.gov.au

Under direct consultation with A/g Director – Engagement – Cities and suburbs Unit Dean Lesser of the Department of Infrastructure, Transport, Regional development, Communications and the Arts. It was acknowledged invitations to participate in some community group level workshops on the National Urban Policy Consultation Draft were sent out late (Friday afternoon for a Monday attendance).

As such Dean Lesser has in writing expressed the Department is happy to receive submission from our community organisation with the deadline extended until COB 18 July. Thank you.

Please consider our below meaningful responses, and strong suggestion, which we hope will lead to the improvement of this draft before further broad consultation prior to this important National Policy is finalised.

National Urban Policy Consultation Draft, May 2024

We support the Australian Government's commitment to updating the p-previous 2011 National Urban Policy / Framework, to enable government, local councils, industry, residents and community to work together and achieve long-term improvements to cities and suburbs across Australia by making them liveable, equitable productive, sustainable, greener, bluer, safer for people and urban wildlife and resilient.

This important National Urban Policy has the responsibility to ensure federal, state and local governments think, act and achieve by cohesive goals and responses and aligned resourcing and approaches. As responding to the same long-term challenges without coordination and with differing levels of urgency would be a failure of this National Urban Policy.

The new policy will risk not being implemented by state and local governments and be ineffective at addressing urban policy Australian challenges, should it be written using unclear language (hiding behind words). And/or set unclear goals, unclear targets and should it not commit to transparently publishing funding linked to milestones.

For the Federal Government to deliver the goals and objectives of this policy, the policy must correctly identify the importance of local government to deliver many of the goals and objectives of the Policy. And acknowledge that local government operates differently across states and territories and within each state.

It is critical local governments are continually included in all formal ongoing two-way dialogue at all three tiers of government. In practice the National Urban Policy will ensure direct representation from larger City Councils, as well as the Council of Capital City Lord Mayors and the Australian Local Government Association.

To strengthen democracy, asset protection and for the credibility of this Policy, it must specify in clear language consistent ongoing processes and co-ordination working with local governments and communities.

A National Urban Policy is urgently needed to create a framework to support regular and long term regional and local planning throughout Australia.

Further consultation must be undertaken with local governments, Prior to finalising The Policy. As there are significant shortcomings in this National Urban Policy which lacks policy and regulatory levers to address:

Transport, at present the Australian Government's regulation and taxation have reinforced the situation where private vehicles are the most convenient and economical way to get around urban areas for most people, putting pressure on our streets and other areas as some people unnecessarily drive into and out of the city centre.

Infrastructure funding, the Policy focuses on large-scale infrastructure. To support urban population growth, the Policy needs to amplify better co-ordination of smaller-scale infrastructure across all three levels of Government.

Currently the Australian Government's Infrastructure Policy lacks how the federal government will facilitate a co-ordinated approach to nationally involved transport infrastructure.

Comparatively to other countries cities, Australian cities lack public transport. This Policy does not articulate a clear worded commitment to increase transport solutions including late night public transport to support more housing and economic activity in urban areas. For example, fast and reliable public transport from Central Sydney to Wollongong and Central Sydney to Newcastle has been an election promise for half a century plus, and this Policy with coordination between the three levels of Government is needed to secure delivery of well-located housing close to transport to get people to work in offices.

For a National Urban Policy Consultation Draft, we strongly suggest from a federal level working with state and capital city / large cities local councils and Lord Mayors to regulate e-transport (bikes, cycle, car, scooter). The National explosion of Electric-Transport conversation is on repeat at Community, Local Government and State Government meetings, all levels understand the main benefits from replacing petrol trips; greenhouse gas reduction, improved public health, reclaimed street space and enhanced equity of mobility + + +. Local councils/ city Lord Mayors and Australian communities do not have the jurisdiction over e-transport shops under residential buildings (fire hazard). We understand the Australian Competition and Consumer Commission last year called for improved national regulation and testing in the sector for e-bike batteries. Further harm reduction is needed at a national level; more training, licence plates, audible e-transport, plus make high-use pedestrian areas either, e-transport free, or e-transport only.

The National Urban Policy can identify it is not practical to have a e-transport dockings station at every popular street corner for electrically assisted bikes, scooters and vehicles. To achieve long-term sustainability will this National Urban Policy state clearly it will work with three tiers of government, major/large city Lord Mayors and community to implement nationwide trials of Smart Stations which collaborate with bike share system providers, using multimodal docking and charging solutions.

Exemplary World-Wide E-transport for City Inspiration Links:

PBSC E-Bike Sharing Schemes in 15+Cities Around the World

<https://www.pbsc.com/blog/2021/09/pbsc-e-bike-sharing-schemes-in-15-cities-around-the-world>

How the holy city of Medina is spearheading electric bike share as part of the Saudi Vision

<https://zagdaily.com/featured/how-the-holy-city-of-medina-is-spearheading-electric-bike-share-as-part-of-saudi-vision/>

E-bikes: Charging Toward Compact Cycling Cities

<https://itdp.org/publication/e-bikes-charging-toward-compact-cycling-cities/>

Currently this Policy to mitigate a housing crisis does nothing to create a framework to be accountable for and support regular and long term regional and urban planning for the provision of built schools and hospitals at a planning and design stage, to be built to be ready for use prior to housing growth areas are occupied.

Urban short-term accommodation is extremely concerning for city and regional communities. Again, this Policy lacks the command of a policy that supports two-way local government and major city, Lord Mayor joint actionable processes to mitigate the direct negative impacts of short-term rentals.

Community Groups are meeting and talking regularly with state and local governments about the very real, and raw local issues: loss of families, destruction of community, and the increased rubbish, that short term accommodation has caused, to name a few.

This Urban Policy must address with all government tiers and provide positive policy and actual changes on the impacts of Airbnb/short-term rentals in the nations urban areas. Including ways to incentivise long-term rentals. Will this National Urban Policy increase the pressure on the Government: Department of Planning, Housing and Infrastructure, NSW Treasury and NSW Fair Trading, to curb short-term rental damage on a micro, and macro scale; Such as the serious issue of lack of housing?

Climate, major flooding, bushfire, extreme heat, pandemics, and air quality events are not addressed strongly enough in this policy. All, natural disaster and hazard risks are linked to serious health consequences for a significant (and growing) proportion of the population. And if that is not enough to respect, the already financial and economic impacts and future financial and economic impacts of Australian cities is too expensive to do nothing in this National Urban Policy.

There is very real mass migration of people on the land relocating to more urban areas. Which on a national scale is a direct result of issues arising from the increasing number of properties that are now uninsurable and land has become or will become too great a risk to occupy. Consequentially, this Policy must lay down the clear worded framework to make urban areas and cities more resilient through meaningful sustainability targets and solutions such as water collection and recycling and exponentially higher canopy tree planting targets. In particular in areas where there are current and future housing development roofs, and not a tree or green space (grass, not astro turf) in sight.

This Urban Policy needs to escalate its pedestrian walkability plan nationwide. Narrow passage ways between commercial and domestic buildings of all heights are wind tunnels and physically plus mentally do not support wellbeing, do not support the day or night economy and do not support urban street trees, planting and urban wildlife. This policy needs to support genuine space between buildings.

National urban design of plazas/open spaces of commercial and public spaces need governance and policy that ensures all levels of government stipulate funding in all urban development applications be provided to plant large/mature shade providing trees (trees survive long-term in clumps better than singularly) prior to completion of the 'build'. For mitigating extreme weather episodes and increased urban heat.

This National Urban Policy consultation must create a framework for communities in regional towns, peri-urban areas and in cities to engage with the challenges that all climate related hazards present for urban areas and build consensus around government responses.

Sustainability, the draft policy lacks clear best practice for the management and planning of future development and modification to current development to protect our natural environment and promote wellbeing in communities.

This national urban policy/ strategy for urban design excellence is neglecting design excellence, which comes in all forms and should address wellbeing and safety. We strongly suggest the inclusion of critiquing all national, state and local council current and future proposed building designs glazing choices to severely minimise (better still mitigate) mass bird and other flying urban wildlife strikes/deaths.

We strongly request this policy in clear language stipulates design guidelines that informed ALL federal, state/territory and local government (plus major city Lord Mayors) design responsible buildings on a national scale for a better outcome for urban wildlife.

It's not attractive or welcome to see when you walk, ride, drive or live and work in a glass tower building the direct results of Bird strikes on our City Streets, or balconies. It's very upsetting for residents, workers and visitors alike. No one wants to walk out of or round our urban buildings seeing dead/dying birds on the pavements.

We strongly request a) National Design Principles, b) National Design response and c) National Design excellence standards, to significantly improve Urban design material choices on an International and National level. Australia can be an exemplar!

Design principles developed and guidelines for building /development sites must include bird safe design. Proposed materials and facade finish with clear glazing, need to be bird safe glazing. Design Excellence assessment needs to be aware of the outcry over bird deaths caused by designing without bird safe glazing.

March 3 2024, SMH article 'Outcry over bird deaths at modern glass bridge'. Where the glass bridge owned by Marrickville Metro shopping centre that connects the two parts of the shopping centre came under fire for not protecting urban wildlife. The design followed the modern architectural trend for glass panels, particularly reflective glass, which leads to the death of millions of birds worldwide. The bridge glass is now being retrofitted with coloured glass and lasers and decals are installed to cover some panels with more modifications needing to be made as

rainbow lorikeets continue to fly into the bridge. The bridge is invisible to the lorikeets. The Inner West Councillor Mathew Howard was to raise the issue at the council meeting on Tuesday as the number of birds 'striking' has been distressing for residents and shoppers. And hopes this sparks a bigger conversation about how our built environment can better support local wildlife and architecture be more friendly towards native birds.

Buildings with large amounts of glazing or mirrored facades are understood to be responsible for huge numbers of bird deaths each year globally, with [one billion killed in the US](#) and an estimated [100 million bird collisions in the UK](#).

In 2019 the US House of Representatives [passed a bill to reduce the amount of glass](#) used for federal buildings in a bid to protect birds from death by collision, while earlier this year [a bill was filed in Washington DC](#) calling for the city's new buildings to use bird-friendly glass. Architects can easily prevent billions of bird deaths a year caused by collisions with glazed glazing windows.

People are becoming increasingly aware of this issue, and as architects learn, so to can the federal, state and local governments architects. This urban policy needs to stipulate legislation showing it understands and has learnt that it's important to the public, to it is important to the nation more and more, so buildings need to be constructed with design elements that help keep birds safe. As such we strongly request this National Urban Policy is an exemplar by:

- All Architects specify All buildings with external glazing include regulating bird-safe glass to mitigate buildings' danger to birds
- We ask that the nation's three tiers of government Architects must take into account and attempt to reduce the impact of their designs on the sentient beings around us. "Architects can easily have films, ultraviolet patterns, and other innovative designs added to glass windows."

New York City passed a bird-friendly law requiring all new buildings and building alterations (at least under 23 metres tall, where most fly) be designed so birds can recognise glass. Windows must be "fitted" using applied labels, dots, stripes and so on. A Zen curtain developed in Brisbane has worked at the University of Queensland. This approach uses an open curtain of ropes strung on the side of buildings. These flutter in the breeze, making patterns and shadows on glass, which birds don't like.

Innovative design, the National Urban Policy can make the nations buildings glazing safer for birds by including architectural elements like awnings, screens, grilles, shutters or external louvers, to deter birds from hitting buildings and dying/being injured. Opaque glass also provides a warning. Birds see ultraviolet light, which humans cannot. Some manufacturers are now developing glass with patterns using a mixed UV wavelength range that alerts birds but has no effect on human sight.

Birds cannot recognise daylight reflections and glass does not appear to them to be solid. If it is clear they see it as the image beyond the glass. They can also be caught in building cul-de-sac courtyards – open spaces with closed ends are traps. At night, the problem is light from buildings, it may disorientate birds. Birds are drawn to lights at night. Glass walls then simply act as targets.

The impact that glazed buildings have on birds made headlines September 2021 when Melissa Breyer from New York City wildlife charity NYC Audobon [collected the corpses of 226 birds](#) killed at the World Trade Center in a single day.

Birds make cities; urban living/working/visiting friendlier as part of the shared environment. This National Urban Policy has a responsibility to provide safe flying and security from the effects of human habitation and construction.

At a national, state and local government Biodiversity Development Assessment Report needs to be evolving and not black & white part of this National Urban Policy. As Native birds and other urban wildlife may not have built nests at the point in time the consultants visit and document a potential development site. Really, a Biodiversity Development Assessment Report is only a forecast. As a forecast there is no evidence that shows where will not be active birds' nests in the trees marked for removal during the week, month, season the trees time when the trees are to be removed. A forecast needs to show due diligence and method for the natural likelihood of nesting birds.

Should the trees marked for removal remain till bird 'dating' season (now), then nests will be built in large and small branched trees. Nationwide city's and regional urban spaces have dwindling numbers of large branched trees,

There needs to be thorough documentation, planning, management plus funding around large tree removal which respects urban wildlife biodiversity on all national, state and local government sites.

Nationally, urban tree canopies on streets and in green spaces (including roof tops) are desperately needed. Where national, state and local government has significant pieces of land and buildings, the nation needs a National Urban Policy to pull its weight by contributing to long term landscaping with canopy trees on street and on building sites to mitigate the urban heat island effect, ensure comfort levels on streets, in green spaces (including roof tops). All development sites commercial and residential needs to not just contribute, but exceed their 'quota' of urban tree canopy cover targets. And importantly be an exemplar of root top green infrastructure nationally.

We support this National Urban Policy's inclusion in all national, state and local urban green areas to incorporate fresh water features. Connection to Country and First Nations representation, must include, respect and recognise the waterfront land topography with tributaries. Plus, the First Nations use of this land, gathering at fresh water to trade, clean and eat in an area. Simple, artistic and perfect examples to guide the final National Urban Design; rooftop terraces, public domains, internal courtyards, landscape design, will also achieve providing access to freshwater in the city for wildlife and pollinators, particularly during seasons of extreme temperature fluctuations and increased heat.

The Swellstone water installation located in Fig Lane Park Ultimo. [320-334 Jones Street](#) is meaningful and small in scale. The sculpture draws inspiration from a natural spring that once existed on the Pymont Peninsula, known by the local settled community as Tinkers Well.



<https://www.cityartsydney.com.au/artwork/swellstone/>

Another water feature of small scale for a small area, is located at the Piccolo Me Cafe, entrance of the Royal Botanic Gardens entrance off Macquarie Street. Google map and drop the Moodji (little yellow human Google street view character at) <https://www.rbgsyd.nsw.gov.au/visit/map#/venues/50>



We strongly encourage the National Urban Design to support the state and local community's and businesses, by stating in clear language, policy that new developments (commercial and residential) are to provide a drop off location for waste: E-waste, battery, toner cartridge, lamps, and globes recycling. Proof of a residential/local business address may be a provision for a drop off, the initiative could be offered during business hours or one day a month? Showing that nationally urban design is committing to ongoing best practice environmental targets for its commercial, residential, plus public spaces, and supporting urban locals to further reduce waste, making City's and regional urban areas greener and cleaner.

This Policy draft must with clear language, significantly and meaningfully increase regulations on protecting, rehabilitation, restoration of natural environments and ecosystems, protection of urban biodiversity and the health of waterways plus air quality.

- review the effects of current glazing governance, policy, regulations and choices in glazing materials on all three tiers of government assets impacting urban biodiversity, protection, rehabilitation, restoration of natural environments and ecosystems in urban environments;

- establish urban wildlife toolbox talks on all three tiers of government assets to increase governance, policy, regulations and policy on protecting, rehabilitation, restoration of natural environments and ecosystems, protection of urban biodiversity and the health of waterways;
- significantly increase funding and governance for all tiers of government to implement new developments (commercial and residential) are to implement urban inclusion of wildlife toolbox talks specific to local each local area;
- significantly increase funding and governance for all tiers of government to implement new developments (commercial and residential) are to implement urban inclusion in all national, state and local urban green areas to incorporate fresh water features. Connection to Country and First Nations representation, must include, respect and recognise the waterfront land topography with tributaries;
- significantly increase funding and governance for all tiers of government to implement new developments (commercial and residential) are to implement urban inclusion in all national, state and local developments offer the provision of a safe a drop off location for waste: E-waste, battery, toner cartridge, lamps, and globes recycling;

Governance and policy for place making that increases wellbeing and connection to biodiversity that is safe is critical. Through this National Urban Policy, a guide in decision-making relating to investment in, and policies for high-quality urban development must require built environment design includes bird safe glazing and access to fresh water for urban wildlife protection, resilience, and sustainability.

- establish urban haulage route plans, governance and designs with local city council's, prior to currently built or future urban areas mass development at a state or federal level to minimise degradation of local areas population health and wellbeing and destruction of the environment and urban wildlife;
- significantly increase funding for continual street tree networks, plus other vegetation clusters to support foot traffic and cyclists to move between public spaces including parks, roads, shopping centres, public transport options, schools, universities, hospitals, three tiers of government assets, and communal open spaces to support the variety of health reasons including passive and active recreation, social connection and wellbeing plus to act as natural cooling systems against heat-island effects;

All National city planning and governance must plan for and be accountable to support the growing national population with high quality, higher density, and higher vertical buildings, built in 'greater city areas' with the strategic goal to sustain compact urban spaces. Like Parramatta, with vast public transport, hospital and school options. These vertically high density 'greater city areas' should ensure higher density areas slow vertical urban spread which costs more to all three tiers of governments.

The Policy draft lacks an implementation plan with deliverable actions which a final version must have to enable governance, timelines and renewal.

The lists of the current activities of the Australian Government in the draft Policy should be removed to ensure they are not confused with a properly formulated implementation plan.

The UN guide [How to Formulate a National Urban Policy](#) (available here) clearly sets out best practice for development of a policy including its implementation plan components. While the Policy's possible actions and principles are generally laudable, they are not Specific, Measurable, Achievable, Relevant, and Time-Bound (SMART). A future implementation plan must have these features.

Clarity is accountability, most of the statements in the Policy do not specifically rule out poor actions and outcomes.

The Policy must include explicit policy and implementation plan actions that the Australian Government will:

- establish a properly funded group to drive improved collaboration across the three tiers of government, and co-ordinate implementation of the Policy, and in doing so, make it clearer the roles of Infrastructure Australia, and any Major Cities Unit;

- fund a significant increase in the quantity and proportion of quality social and affordable rental housing and housing for people experiencing homelessness including using government land assets and introducing mandatory and coordinated affordable housing contributions schemes across local government areas to maximise the delivery of affordable housing as more development occurs to meet the National Housing Accord;
- review the effects of all the Australian Government's activities and regulation, including taxation and financial regulation, on urban development processes and the housing system including development and affordability;
- change regulations, taxation and fund programs to upgrade the sustainability and resilience of homes of vulnerable people, co-designed with local governments and key community organisations;
- establish an agreed funding framework for all levels of government that will deliver the infrastructure required to support urban (re)development;
- establish national carbon budgets for urban development and urban transport including development of a National Gas Decarbonisation Roadmap and assist states and local governments to develop their matching targets and not fund projects that are not consistent with meeting those targets;
- establish urban haulage route plans, governance and designs with local city council's, prior to currently built or future urban areas mass development at a state or federal level to minimise degradation of local areas population health and wellbeing and destruction of the environment and urban wildlife;
- re-establishing the Australian Government's role in co-ordinated City spatial data particularly in relation to disaster /hazard risk;
- review the operation of Infrastructure Australia and determine if any process and priority adjustments are required to most efficiently deliver Policy goals and objectives;
- require only urban development and transport patterns that support active transport and consequently health outcomes as a condition of funding;
- review the effects of current glazing governance, policy, regulations and choices in glazing materials on all three tiers of government assets impacting urban biodiversity, protection, rehabilitation, restoration of natural environments and ecosystems in urban environments;
- establish urban wildlife toolbox talks on all three tiers of government assets to increase governance, policy, regulations and policy on protecting, rehabilitation, restoration of natural environments and ecosystems, protection of urban biodiversity and the health of waterways;
- significantly increase funding for active and public transport infrastructure and stop funding road projects in urban areas;
- significantly increase funding for continual street tree networks, plus other vegetation clusters to support foot traffic and cyclists to move between public spaces including parks, roads, shopping centres, public transport options, schools, universities, hospitals, three tiers of government assets, and communal open spaces to support the variety of health reasons including passive and active recreation, social connection and wellbeing plus to act as natural cooling systems against heat-island effects.
- update the Urban Design Protocol for Australian Cities and require its integration with state planning frameworks; and
- measure and publish progress on the Policy goals and objectives.

Currently, the Draft National Urban Policy lacks a clearly worded Access Strategy, Action Plan with Investment Priorities for Cities and Regions to support ongoing economic, social and environmental outcomes: greener/cooler cities, spaces between buildings, access to healthy blue spaces, creating a city for walking, cycling and public transport, design excellence for urban wildlife, large tree protection, cultural urban fresh water features, on the ground safe e-recycling and e-transport multimodal docking and charging solutions. These priorities are needed in all major Australian cities.

Thank you for considering our absolute concerns with this draft and strong suggestions for the final National Urban Policy.

Sincerely

Sydney Local Resident & Member of several Sydney Community Groups