



Council Ref: 24/331380

4 July 2024

Urban Policy Team
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
urbanpolicyinput@infrastructure.gov.au

Dear Urban Policy Team,

Re: National Urban Policy – Consultation Draft – Submission

Thank you for providing the opportunity to comment on the National Urban Policy – Consultation Draft (May 2024).

Council officers have reviewed the draft document and provide feedback on the key objectives of the proposed policy, which is attached for your consideration. In summary, the comments relate to:

- General support for a National Urban Policy;
- Timing of consultation and information sessions;
- The relationship to existing State/Territory and local polices and systems;
- The need for statutory backing and a detailed implementation and Funding Plan;
- Challenges and barriers to growth, including land fragmentation and land acquisition timeframes and funding;
- Housing affordability, density and diversity, and market forces;
- Infrastructure to support growth, including open space, schools and transport;
- Clear assessment parameters for managing climate change;
- The need for a whole of government approach including collaboration and coordination to deliver growth, and
- The need to recognise the complexities and timeframes of housing and growth area delivery.

I look forward to your consideration of the above matters and happy to discuss at the appropriate time.

Yours sincerely



Josh Pownell
Manager Strategic Planning

ATTACHMENT 1 – SUBMISSION ON DRAFT NATIONAL URBAN POLICY

General Comments

- It is positive to see the Federal Government becoming directly involved in urban policy.
- However, the timing between notification of the information sessions (Friday 21 June) and the actual sessions (Monday 24 June) was very brief and resulted in many interested parties being unable to attend. This does not support the Policy's intent of broad ranging, meaningful and effective community participation and engagement in urban planning initiatives (see page 15).
- It is not clear how the Policy will 'value add' to the existing state/territory and local policies and systems or result in broad ranging and meaningful change. Further, the link to the Parliamentary Inquiry into the NSW Planning Framework is unclear.
- For the vision, goals, and objectives of the Policy to be achieved, the Policy would need to be supported by a detailed Implementation and Funding Plan that clearly identifies responsibilities for funding/resourcing and delivering key outcomes in a sequenced and logical way.
- The goals and objectives of the Policy also needs to be embedded within statute at all levels to ensure accountability. Further, systems and funding need to be in place to enable delivery of desired outcomes.
- Council officers also note that the Australian Government has previously made several commitments under the Western Sydney City Deal which are yet to be fulfilled, including delivery of the North South Rail Line.

Objective 1 – No-one and No Place Left Behind

Challenges / Barriers to Growth

- Key mechanisms need to be introduced to assist councils in growth areas to manage precincts which comprise fragmented land holdings in diverse ownerships. Additionally, funding to support precinct planning in local areas should be prioritised as a matter of urgency and extended to include funding to councils to enable upfront purchase of land required for infrastructure and open space, and natural areas, in precinct planning. This will support urban growth and help facilitate the timely delivery of new housing stock, and create more certainty, fairness and timeliness for owners whose land is identified for open space, riparian land or other infrastructure purposes. This funding could take the form of grants or interest free loans to councils, with loans only repayable once sufficient developer contributions have been collected.

Housing

- The Policy mentions housing affordability and density, but housing diversity also needs to be prioritised. Our communities are diverse, and a better housing mix is required to better accommodate broad ranging needs.

- In terms of housing affordability, it is not clear how opportunities to provide affordable housing can be shared across our cities and regional areas.
- Promoting higher densities needs to be supported with clear evidence on the infrastructure needs/demands created by higher development yields. Many areas are planned for a certain capacity and additional dwellings/development creates strain on systems not designed to cope for the additional growth.
- Australia currently has a situation where housing demand far exceeds existing and upcoming supply. Market conditions need to be explored/assessed so that the major drivers of this imbalance can be addressed.

Objective 2 – All People Belong and Are Welcome

Housing

- As mentioned above, the Policy mentions housing affordability and density but does not mention housing diversity. To ensure urban areas represent diversity and are vibrant, greater housing diversity and choice needs to be prioritised to ensure that diverse and changing housing needs are accommodated, while providing more affordable housing options.

Infrastructure

- As mentioned above, greater housing densities must consider the required infrastructure (including social infrastructure) to support vibrant and diverse communities.

Objective 3 – Our Urban Areas Are Safe

Climate Change

- Planning to address climate change is mentioned. However, there needs to be a national approach and clarity around how our cities can transition and a clearer connection to state/territory planning frameworks to ensure a consistent approach. For example, setting clear assessment parameters may be useful to inform state/territory policy and frameworks on matters such as urban heat.

Objective 4 – Our Urban Areas Are Sustainable

Climate Change

- As mentioned above, planning to address climate change is mentioned. However, there needs to be a national approach and clarity around how our cities can transition and a clearer connection to state/territory planning frameworks to ensure a consistent approach. For example, setting clear assessment parameters may be useful to inform state/territory policy and frameworks on matters such as urban heat.

Objective 5 – Our Urban Environments and Communities Promote Health and Wellbeing

Infrastructure

- As mentioned, greater housing densities must consider the required infrastructure (including social infrastructure) to ensure equitable access is provided across urban areas. This includes access to green and blue grid networks, recreational areas and active transport infrastructure to facilitate healthy communities.

Housing

- To ensure urban environments and communities promote health and wellbeing, it is important that greater housing diversity and choice, including affordable housing options, are prioritised and delivered in urban areas to cater for diverse and changing housing needs.

Objective 6 – Our Urban Areas Promote Productivity

Whole of Government commitment

- As noted in the Policy, there needs to be commitment and ongoing collaboration between and across all levels of government to ensure the timely delivery of appropriate city shaping, growth enabling and growth servicing infrastructure. However, there also needs to be integrated action. Detailed planning and development of growth precincts is currently hampered by the lack of strategic infrastructure coordination, funding and delivery. For example, page 23 states that the “provision of schooling should be front and centre in new urban developments to ensure all children have access to high quality education.” However, in reality, schools are not always provided in a timely or appropriate way. School sites are often undersized and overcrowded, and reliant on external facilities for playing fields, parking, drop offs and the like. A further example is that provision of public transport is often promised but never delivered or delivered in a way that does not meet user needs.

Concluding Comments

- The Policy is ambitious and broad ranging at a high level, but fails to recognise the complexities, competing priorities and conflicts (land use and other) that need to be considered and balanced in any urban planning initiatives and in the delivery of liveable, equitable, productive, sustainable and resilient urban and regional areas. It also fails to recognise the amount of time required to work through, negotiate and balance all competing interests in land use planning and development processes, and the cost burden of these processes, which ultimately impacts housing affordability and end users.

