

12 July 2024

Director, National Urban Policy Project Office
Cities and Suburbs Unit
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Dear Director,

RE: Council of Mayors (SEQ) Submission – Draft National Urban Policy

Thank you for the opportunity to provide feedback on the National Urban Policy consultation draft.

Council of Mayors South East Queensland (CoMSEQ) was established in 2005 to represent the interests of one of the fastest growing regions in Australia. Representing eleven local governments across SEQ, member Councils work together to tackle the region's biggest challenges, explore emerging ideas and deliver solutions which protect and enhance the prosperity of SEQ.

South East Queensland (SEQ) is experiencing unprecedented population growth. By 2046, the region will be home to an additional 2.2 million new residents or more than 6 million people, requiring an additional 900,000 dwellings. This growth can be likened to adding over four cities the size of Canberra to the SEQ region. This growth trajectory places the region's population in proximity to the current population of Greater Sydney. While this presents a significant challenge, SEQ is uniquely positioned to address this with timely and catalytic investment from the Australian Government to ensure that the region's infrastructure keeps pace with its rapidly growing population.

Unlike other regions, South East Queensland (SEQ) already has a robust urban growth plan (ShapingSEQ) that aligns national, state, and local objectives. Updated in 2023 to reflect the National Housing Accord's housing targets, ShapingSEQ provides a strategy to address sustainable urban growth in SEQ. However, the Australian Government has a unique and critical role in supporting the infrastructure needs of the region to enable the social, economic and environmental outcomes that the region already seeks to achieve.

CoMSEQ welcomes the Australian Government's release of a draft National Urban Policy as an important step towards more liveable, equitable, productive, sustainable and resilient cities and regions. It is, however, a policy that highlights only some of the challenges facing our local governments in responding to unprecedented growth.

There are several areas of the policy that CoMSEQ would like to provide comment on, which includes:

- Coordinated implementation
- Connectivity as a critical pillar
- Definition of urban
- National Settlement Policy & growth-aligned investment planning
- Australian Government role in regional planning and governance

Coordinated implementation

While the draft policy articulates a comprehensive set of aspirations, many of which are broadly supported, it would benefit from further detail on implementation pathways and actions. Translating the policy aspirations into more specific actions and measurable targets would strengthen the policy's impact and provide a clearer roadmap for implementation across all levels of government and industry.

The draft policy would benefit from acknowledging that implementation will need to go beyond "business as usual" to address emerging urban challenges and achieve the desired outcomes of the policy. Recognising the need for innovative and collaborative solutions will be crucial. Mechanisms like the SEQ City Deal offer a platform for further development and integration of the national urban policy. The reference to City Deals is not recognised in Appendix B: National Initiatives Underway despite significant work being undertaken in the current SEQ City Deal which seeks to implement many of the policy objectives identified in the draft policy.

Connectivity as a critical pillar

CoMSEQ strongly supports Objective 1: No-one and no place left behind and the recognition and need to address connectivity challenges in outer urban areas. However, the draft policy falls short of providing further clarity and implementation pathways to support this. In addition, the importance of connections between cities and regions has limited policy direction.

It is recommended that the draft policy strengthens the critical role of connectivity between cities and regions as a fundamental driver of the national economy, equity, and sustainability. Enhancing regional connectivity is essential for bolstering national competitiveness, facilitating the efficient movement of people, labour and goods, and promoting more sustainable transportation alternatives to the current reliance on private vehicles.

SEQ, like many other regions, has a complex challenge in addressing accessibility to public transportation outside CBDs and inner-city areas. Whilst acknowledging the significant increase in residents continuing to work from home since COVID-19, only 5.1% of residents in SEQ use public transport to travel to work (ABS Census, 2021).

Further, there is no mention of the potential that faster rail offers Australian cities as a way to connect urban and regional centres, precinct development, supporting housing supply and affordability, achieving net zero and improving national productivity.

Given the pivotal role of connectivity in driving economic growth, enhancing sustainability, and ensuring equitable access to opportunities across Australia's rapidly growing urban and regional areas, we strongly recommend that the National Urban Policy elevate the importance of connectivity as a critical pillar of the National Urban Policy, recognising its fundamental role in achieving the policy's broader objectives.

Definition of urban

Covering an area of more than 35,000 square kilometres, SEQ represents a diverse mix of places from regional towns to our State's capital city. The policy does not provide guidance on the definition of urban, nor where potential crossover would be between the Regional Investment Framework and this National Urban Policy.

A holistic approach to urban and regional planning acknowledges that cities and their surrounding areas are strongly interconnected. This interconnectedness has far-reaching implications for urban planning policy, influencing infrastructure capacity, population modelling, employment planning, and economic development. The National Urban Policy should recognise the crucial role of regional planning and the intricate economic relationships between and within regions.

The National Urban Policy should recognise the critical importance of regional planning and the pivotal role that the Australian Government plays in supporting growing regions like South East Queensland, which are critical in accommodating national population. This should include actions such as increased investment in regional infrastructure including funding for transportation networks, housing, education, healthcare, and other essential services that support thriving communities.

National Settlement Policy & growth-aligned investment planning

The Australian Government plays a critical role in shaping growth in our region and investing in catalytic infrastructure that is needed to drive productivity for urban areas facing significant population growth, particularly given the escalating dwelling demand that is driven by both net overseas migration targets and recent interstate migration. As identified in the South East Queensland Regional Plan (ShapingSEQ), by 2046, 64% of the population growth in SEQ will have come from outside of SEQ, with much of that growth coming from interstate and overseas migration.

Whilst the emerging national urban policy is promising, there is still a clear gap in strategic national settlement policy and growth-aligned investment planning. This gap poses a significant challenge for growing regions like SEQ, particularly when Local Governments are asked to shoulder the implications of national policy. There is a growing need for the Australian Government to take a substantial role in investing and facilitating population growth and infrastructure investment and to revamp investment frameworks to better support Local Governments as they face rising service demands and infrastructure costs.

In Queensland, Local Government (3%) and State Government (16%) receive significantly less tax take than the Australian Government (81%) and have significantly less capacity to invest in catalytic infrastructure required to support significant growing populations. Similarly, the Australian Government benefits from investment in catalytic infrastructure through tax revenues such as GST.

The draft policy states, “*Overseas migration and an ageing population make it critical to strategically plan and prepare our cities for the decades to come.*” (p. 23) however; the acknowledgement of increased overseas migration on the projections into planning does not go further to suggest how this could or will be strategically managed. Current and future growth challenges could be managed more effectively though stronger collaboration between levels of government and a stronger national mandate to prepare for growth and change.

This topic was explored by the House of Representatives Standing Committee on Infrastructure, Transport and Cities, who recommended the preparation of a national settlement strategy (*Building Up & Moving* 2018). Additionally, the Planning Institute of Australia (PIA) has also been calling for a national strategy since 2018.

CoMSEQ recommends that the National Urban Policy identifies an action to undertake further consultation and engagement with State and Local Government to consider the development of a National Settlement Policy and growth-aligned investment planning that provides long-term coordination and implementation mechanism for managing and funding population growth at a national level.

It is also important that growth management and modelling programs involve local government to foster enhanced cooperation and shared understanding among all relevant stakeholders.

Australian Government role in regional planning and governance

There is significant potential to strengthen the draft policy to incorporate policy recommendations on governance, implementation, coordination, and partnerships. It would also be beneficial to leverage the Australian Government's established commitment to current City Deals as a policy tool to support the national policy's successful delivery.

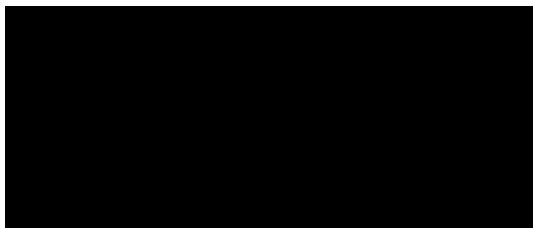
To maximise impact and implementation of the policy, we suggest incorporating a deeper appreciation and need to foster genuine collaboration across all levels of government. This would support more effective urban policy outcomes and catalyse meaningful reform.

CoMSEQ welcomes the Australian Government's release of a draft National Urban Policy. However, given the pressing challenges cities and regions face with housing, funding, infrastructure, and sustainability, a clear and efficient implementation pathway for how urban transformation will be achieved in practice will be crucial.

South East Queensland Local Governments are eager to work with the Australian Government, State Government and relevant industries to address these matters.

Should you have any questions regarding our position or wish to discuss any aspect of our position on this important subject, please do not hesitate to contact me on (07) 3040 3460.

Kind regards,



Scott Smith
Chief Executive Officer
Council of Mayors (SEQ)