

## Submission for the draft National Urban Policy

July 2, 2024

Thank you for the opportunity to provide feedback on the draft National Urban Policy. We commend the Commonwealth government for taking this initiative. In our view, it takes an important and timely step forward in many areas:

- It recognises and responds to the inherent complexity of urban areas. The policy represents a significant first step towards aligning agendas and actions in the urban environment to better serve the people living in our towns and cities. It recognises the importance of bringing together multiple departments and coordinating the work of national, state, and local government, community groups and individuals.
- It recognises that management, programming and physical interventions in the fabric of our towns and cities all play a role in contributing to people's quality of life. Change needs to happen as much in people's hearts and minds as on the ground to embrace the opportunities and meet the challenges of a more sustainable future.
- It will help define what terms like liveability and equity mean for the Australian urban policy community. This shared understanding will assist discussions between professions and focus attention on the actions that will allow us to embed these concepts in our work.
- It connects issues, challenges, specific actions and related national and international policies and accords. This will assist the policy community to hone in on the most efficient means to address urban problems. We contend the lack of such a policy and relevant national oversight and coordination has led to poor planning outcomes and contributed to many of the problems we now face in our towns and cities.
- it provides a much-needed opportunity to consider not just the liveability of our towns and cities but also addresses the more profound question of their ongoing habitability. Issues like rising sea levels, extreme weather events, pollution and the urban heat island threaten lives and not just wellbeing.

Furthermore, we commend the recognition of the importance of maintaining and enhancing the quality of life offered by our towns and cities. We note this plays an important role in supporting our economic vitality and international competitiveness (OECD 2023) as well as contributing to achieving Global Biodiversity Framework targets (Convention on Biological Diversity 2022)

We recognise that co-ordinating these different domains will raise significant challenges. It will require many downstream changes to policies and practices and the commitment of a wider range of skills and other resources to urban problems. This will be costly and potentially disruptive in the short term but we suggest it will be worth it. Indeed, failure to do so will have far

more significant consequences. It will diminish the chances that the inhabitants of our towns and cities can meet their needs, thrive and fulfil their potential. It will make our towns and cities less fit for purpose as the settings of commercial activity, health, education and culture. It will cast us all into an uncertain future, vulnerable to external threats growing in number, complexity and the risks they pose.

With this in mind, our submission provides a commentary on some of the issues relating to the policy. It presents some suggested amendments so that the admirable ambition of the policy may be achieved more swiftly and comprehensively.

### **The goals of the policy**

We commend the recognition in the policy of the inter-relationship between goals, challenges and objectives and the acknowledgement that addressing one goal in isolation may positively or negatively impact the others (p17). We consider this to be an important strength of the policy and warrants further emphasis, in particular by emphasising the actions that complement other goals.

We further note the historical tendency to see problems in isolation, typically from the perspective of a particular department with a narrow area of responsibility; usually planning, social services, utilities, etc. We see the resulting unintended consequences this has in other aspects of liveability every day. We suggest that avoiding negative impacts and optimising the positive ones is an important feature of this policy. We believe this should be given greater emphasis and guidance offered as to how we reconcile these diverse goals in our interventions if we are to avoid action in one area eroding gains in another.

Furthermore, in keeping with our commitment to the Sustainable Development Goals and their underlying recognition of the inherent dignity of all people, we consider that the goals of the policy should reference equality of opportunity, a right to self-determination and the means of expression as critical components to liveability. The absence of these things limits people's quality of life and chances of fulfilling their potential (OECD 2023).

We further consider that this is an economic as well as moral imperative. In a globalised and online world productivity depends on attracting the talented and creative people essential for innovation (Investment NSW 2022). These people can go anywhere. To be competitive against competitor cities and attract this human capital our cities must offer a high quality of life (amongst other things). The OECD found that non-work and non-pecuniary drivers can be the deciding factors when considering employment options. They cite factors like social cohesion and the quality of public services (transport, health, and education), leisure activities and local cultural offerings as contributing to this appeal and so supporting productivity (OECD 2022).

We note that many primary industry-dominated towns and cities all over Australia suffer dramatic boom and bust economic cycles that damage the economic and social fabric in both the boom and the bust phases. This is due to the sudden influx and then exodus of workers as major projects move through development, operation and then closure phases. The demographic imbalance of relatively few families and a preponderance of transient workers, associated with the rapid spiralling and crash of housing costs make it difficult for community life to flourish. This reinforces the perception of these towns as less appealing places to settle. We consider that investment in nurturing the quality of life factors noted above may assist in breaking this cycle and contribute to providing a more settled and diversified community.

We suggest that the Policy could extend its integration of national and international alignment through acknowledging and including consideration of the considerable value that urban areas have for the conservation of biodiversity at the national and bioregional scale. We note that urban areas are important areas for biodiversity conservation, often existing in the least conserved, most developed ecosystems. We suggest the Policy could adopt and include Targets from the Global Biodiversity Framework (GBF) (2023) - in particular Target 12 – *Enhance Green Spaces and Urban Planning for Human Wellbeing and Biodiversity*, along with Targets 1,3,4,6,7,11 and 14 from the Framework. Reference to urban areas is also present in the Australian Government's 30 by 30 Strategy (DCCEEW 2024) intended to meet Target 3 of the GBF.

We note the disadvantage that burdens so many urban Australians is very unevenly distributed and concentrated in some areas rather than others. This diminishes the health and wellbeing for those living in these disadvantaged areas (AIHW 2022). This disadvantage is amplified as these areas often become stigmatised and their inhabitants are denied opportunities simply because of assumptions others make about people from that neighbourhood. This prejudice denies them access to important opportunities or equality of esteem and locks whole communities into intergenerational disadvantage (Cobb Clark 2019). We further note research (Verdouw, J., & Flanagan 2019) that suggests that those trapped in such areas enjoy fewer and weaker links to the wider community than those in more prestigious communities (Warr 2005), further entrenching disadvantage.

We observe that communities that have had greater experience in responding to changing circumstances and exercising self-determination do better in difficult times than those that haven't (Ealy 2010). It is the adaptable that survive not the well-adapted, as the adage attributed to Charles Darwin has it.

To this end, we recommend the following changes are made to the goals of the policy (p17-19):

1. The goals and objectives are graphically presented as a matrix with some cells populated by example actions to illustrate how actions can meet multiple goals and objectives.
2. A statement is added to the introductory text on p17 that the goals are best met by actions that demonstrably meet multiple objectives and reconcile potential conflicts.
3. The list introducing the factors that determine liveability should be amended as follows:
  - a. Access to green and open space *and to nature and natural areas*
  - b. Opportunities for recreation, arts, sport, cultural connection, expression and social interaction
  - c. housing design, location and diversity
  - d. A new bullet point is added: *Realistic access to a range of transport modes*
  - e. A new bullet point is added:  
*Respect for valued landscape and built character.*
4. The list introducing factors that can determine a city's equity should be amended to include two new points that state that factors that can determine a city's equity include:
  - a. *The geographic distribution of the determinants of health is uneven and can consign residents of some areas to poorer health and thus diminished access to the opportunities of life.*
  - b. *Prejudices that become attached to particular areas can impact how other people see the residents of that area and the opportunities they are willing to extend to the people living in these disadvantaged areas*
5. The list introducing factors that determine productivity should be amended to include two additional points:
  - a. *Qualities that enhance liveability are central to attracting the creative, talented people essential to innovation who could choose to go anywhere.*
  - b. *The capacity to create efficiencies in the use of land and landscapes and in minimising the impacts of commerce on the urban and wider environment.*
6. The list introducing factors that enhance sustainability could be amended as follows:
  - a. *urban biodiversity including biodiversity inclusive urban planning (GBF Target 12)*
  - b. *efforts to reduce emissions, pollution and waste across all industries*
  - c. *efforts to enable and encourage local food production networks and systems in urbanised environments*
7. The list introducing factors that enhance resilience includes an additional bullet point:

- a. *Past experience of working collectively to overcome challenges can assist people to respond to disasters*

### The objectives of the policy

In relation to the section introducing the objectives ( p21 ) we suggest the following changes in keeping with the commentary above:

1. In relation to Objective 1: No-one and no place left behind we suggest the text is amended as follows:
  - a. *improve access to housing that is affordable, appropriate to the needs of the community, responsive to its context and well located.*
  - b. *Appropriately designed (responsive to its setting, contributing to the areas built and landscape character) and located densification and infill development can also increase sustainability and diminish vulnerabilities associated with car dependency*
2. In relation to Objective 2: All people belong and are welcome we suggest the text is amended as follows:
  - a. *investing in sport infrastructure, green spaces and diverse community activities can improve social cohesion and a sense of belonging in communities.*
3. In relation to Objective 3: Our urban areas are safe we suggest the text is amended as follows:
  - a. *Urban safety encompasses reducing the risk and impacts of accidents, inclusivity and crime prevention strategies while enhancing climate resilience and disaster preparedness*
  - b. *Cities must also address air and water quality and climate challenges, such as flooding, wildfire and the urban heat island effect through improved planning, infrastructure standards, and urban design.*
  - c. *A new bullet point is added: cities must move to intrinsically safer modes of transport where possible.*
4. In relation to objective 4: Our urban areas are sustainable we suggest a new sentence is added at the end of the introductory text:
  - a. *Keeping urban areas compact can help support food security and retain natural values.*
  - b. *Building capacity for local food networks and community gardens into urban planning will help ensure stable food systems and build social cohesion*
  - c. *Ensuring natural areas are retained and expanded in urban environments will ensure biodiversity can provide co-benefits to humanity*
5. In relation to objective 5: Our urban environments and communities promote health and wellbeing. We suggest the introductory text is rewritten as follows:
  - a. *Urban areas must support healthy, active lifestyles through access to green and blue spaces, high-quality housing, and active transport options as well as programming of public space to*

*facilitate communal activities and events that provide opportunities for participation and expression.*

- b. Enhancing tree canopy and vegetation cover can make cities healthier and reduce the growing impacts of the urban heat island effects.*
6. In relation to objective 6: Our urban areas promote productivity we suggest another sentence is added to the end of the introductory text
  - a. Competing for the talented and creative people essential for innovation will require that our towns and cities offer a competitive standard of liveability with other magnet cities.*

### **Challenges and Possible Actions for each objective**

In relation to the more detailed articulation of the objectives (p 22-43) we commend the identification of challenges and possible actions in the policy. This will assist the policy community in focusing on the most effective ways to address urban problems and illustrate the link between issues and appropriate action. However, we consider that the case for the suggested actions might be enhanced by explicitly emphasising how actions contribute to meeting multiple goals and address multiple issues. For example, in the Netherlands the creation of a new type of street known as 'Woonerfs' or 'living yards' allowed these streets to be experienced not just as mono-purpose conduits for vehicles but instead as multi-purpose spaces, contributing to liveability in many ways. This included providing a slow-speed environment for vehicle drivers and a high amenity, safe, social and play space for local residents. This also can help ensure these streets are a better setting for water-sensitive urban design and offer enhanced tree canopy to make these streets safer, more pleasant, less polluted and more resilient to climate change.

We believe articulating these potential additional or subsidiary benefits made possible by the actions in the policy can help make a compelling case for these actions.

We suggest the following specific changes are made to the policy:

#### **No-one and no place left behind**

We share the conclusion made by Pickett, K., & Wilkinson, R. (2010). that poverty hurts the poor but inequality hurts everyone. The key urban challenges discussion for this objective would benefit from an additional bullet point highlighting the imperative to address the difficulties arising from our society's changing makeup. To this end, we suggest the following is added to the list of challenges:

- 1. Changing demographics: the changing social make-up, reduced household size and ageing population of Australian urban areas are rapidly changing the demands placed on our cities to meet people's needs. This is increasingly challenging for those less well-off in our urban*

*communities who are less able to compete for appropriate, well-located homes.*

The following amendments would enhance the Possible Actions for this objective:

2. Under the action starting 'update land use planning systems to accommodate a greater mix of housing and higher-density housing in well-located areas...' an additional sentence is added stating: *Enhance design capacities to address the conflicts that can arise from this intensification to retain and enhance urban amenity, valued character, improve canopy cover and minimise community resistance and distress.*
3. Under the bullet point 'Collaborate with state, territory and local governments and community organisations' we suggest the following additional second level point stating *Co-ordinate actions to renew and revitalise stigmatised neighbourhoods.*

### **All people belong and are welcome**

We welcome the emphasis the policy puts on ensuring equal access to the opportunities of urban life. However, we believe the following amendments would further focus attention on the key challenges and actions:

1. In the introductory, italicised text for this objective we suggest the following amendments are made: *We will promote equitable access to sport precincts and other shared recreational facilities in our urban areas and foster a sense of belonging in our communities.*
2. In the Possible Actions for this objective we suggest additional actions :
  - a. *Engage local communities to understand the social landscape of hopes and fears and shared values. Use this understanding to ensure planning and design is responsive to both the social and physical surroundings.*
  - b. *Support opportunities for people to participate in community activities through placemaking activities*

### **Our urban areas are safe**

We commend the emphasis on safety. We note a sense of safety is an essential pre-condition if we are to meet our other needs. However, we suggest that safety means little without security; the ability to live life without care and freedom from the weight of concerns that blight other aspects of our lives and diminish our ability to meet the full range of our needs. We further observe that this reflects the UN's articulation of safety fitting within a broader framework of 'human security' (UN, undated).

Consequently, we suggest the following amendments:

1. The objective is better defined as *Our urban areas are safe and secure*

The introductory text is amended thus:

2. Urban environments should be safe for all. This includes creating inviting spaces *where accidents and crime are reduced, particularly for marginalised groups and others sensitive to the fear of accidents and crime.*

The following amendments would enhance the Possible Actions for this objective:

3. Inclusivity and safety in public spaces: Urban areas must be safe and inviting, promoting participation of people of all ages, cultures, abilities, genders, religions and *economic and social* backgrounds. Accessible, *appealing* and safe public spaces are vital for community wellbeing.
4. In relation to the discussion section for this objective, we consider that the observation made in the policy that 'An increasingly important aspect of safety in Australian cities is resilience to the impact of weather-induced hazards like flood and bushfire' (p29) would be enhanced by making a specific mention of the urban heat island effect given the urban focus of this issue and the increasingly pressing risks it poses to human safety.
5. In the possible actions for this objective, under the bullet point 'collaborate with state, territory and local governments' we believe additional second-level bullet points should be added:
  - a. *Extend tree canopy and vegetated surfaces over more public space to minimise the risks posed by the urban heat island effect.*
  - b. *Prioritise investment in intrinsically less dangerous modes of transport considering accidents, pollution and impact on climate change.*

### **Our urban areas are sustainable**

We fully support the emphasis on greater urban sustainability. We consider that achieving this requires challenging the entrenched market preference for housing and neighbourhoods that aggregate to create low-density 'sprawling' suburbs and mono-function streets. As such the national urban policy should seek to sway the market towards well-designed, needs-responsive dwellings and transport options if people are to readily take up and demand these more sustainable housing types, neighbourhoods and behaviours.

We further observe the imperative to increase comfort in the public realm if we are to ensure active transport is competitive and minimise the risk of heat stress to human health and the health of the wider biological community.

We suggest that the policy include proactive measures to support the conservation of core areas of natural habitat and biodiversity in urban areas, prioritising these at the Bioregional scale and including commitments to Global Biodiversity Framework Target 12, and to *Target 14 – Integrate Biodiversity in Decision Making at Every Level.*



To this end, we suggest the following amendments:

1. The key urban challenges include additional bullet points:
  - a. *Market resistance and limited capacity: Future proofing our cities will require a significant diversification of our housing stock and a parallel increase in the market appetite for more compact, urban dwellings. Achieving this will require a broadening of design skills in the development and planning industry to facilitate sensitive and appropriate densification, greater building skills for different typologies and a coordinated 'hearts and minds' strategy to draw the market's attention to new housing types and ways of living.*
  - b. *Urban/rural interface: much of our most productive farmland surrounds our major urban areas. Maintaining the capacity of this farmland to support food security will require careful management of the urban/rural interface and careful planning of the peri-urban area.*
  - c. *Green and blue spaces: a lack of adequate prioritisation for biodiversity in urban planning or inequitable distribution of natural spaces in urban areas has profound impacts on biodiversity and climate resilience.*

In relation to possible actions:

2. Under the bullet point Invest in sustainability initiatives we suggest the following amendments are made:
  - a. amend the action as indicated: planting *and* managing trees and other vegetation to provide cooling and shading
  - b. additional secondary level points are added:
    - *Facilitate people to support greater ecological health by increasing capacity to make informed choices about the use, management and landscaping of private and shared land.*
    - *Actively seek greater protection options for critical biodiversity or climate refuge assets within urban and near urban areas through direct acquisition, change of tenure or zoning or philanthropic community investment- Support community groups to participate in retaining and enhancing natural values.*
3. Under the bullet point 'Collaborate with state, territory and local governments, to:' we suggest another secondary level point is added
  - a. *Provide a strategy to address interface issues between urban and rural areas in the peri-urban issues*

### **Our urban areas and communities promote health and wellbeing**

We commend the recognition implicit in the title of this objective that health has personal, social and physical determinants. An important example of this is the impact that a perceived lack of safety has in deterring healthy behaviours. This perception is impacted by physical characteristics such as lighting, proximity to sources of danger, such as traffic, personal factors such

as age and gender and social factors such as cultural expectations and personal experience.

We also consider that the increasing risk of climate change requires greater emphasis, particularly relating to the urban heat island effect. Pollution also requires greater emphasis as we face the increasing challenges of population growth and the intensification of our towns and cities. Research from UNSW found that 'Reducing air pollution is one of the best investments for Australians' health, the environment, the economy and social equity' (Smith 2023)

To this end, we suggest the following changes:

1. In relation to the challenges for this objective we suggest that the following challenges are added;
  - a. *The importance of the qualitative aspects of people's surroundings: people always have a choice and are subject to many influences that encourage or deter social interaction or physical activity. Encouraging people to be active, engage with others and so enjoy all the benefits that come from that requires designing places that make healthy activities relatively more appealing than less healthy, solitary, sedentary alternatives.*
  - b. *Recognition of the impact of contaminants on health and wellbeing: Excess light and sound has been identified as an endocrine disruptor and impacts on heart health (Victor Chang Institute 2023). Exposure to fine particulates worsens asthma, increases hospital admissions, incidences of heart attacks as well as premature death from heart or lung diseases, such as chronic bronchitis (also called chronic obstructive pulmonary disease or COPD) (NSW undated).*
2. In relation to possible actions we suggest additional bullet points stating:
  - a. *Support higher design standards of public spaces to ensure they are relatively more inviting for a wide range of activities and as a setting for interaction.*
  - b. *Support increases in tree canopy and vegetation cover to mitigate the anticipated increase in the urban heat island effect.*
  - c. *Diminish car dependence and reliance on road-based transport in urban areas to diminish fine particulate pollution.*

### **Our urban areas promote productivity**

We fully agree that government policies and resources can help provide a more conducive environment for people to conduct business. We further note the increasing importance placed on human capital in an increasingly globalised world. To this end, in keeping with the commentary above we suggest an additional point stating:

*Competitive liveability: attracting the human capital that is at the heart of competitiveness and productivity in an increasingly globalised market*

*requires investment to maintain and enhance a high standard of liveability. A high level of natural assets, social cohesion, public services (transport, health, and education), leisure activities and local cultural offerings contribute to liveability (OECD 2022).*

## **Principles**

Given the scarcity of land and the diverse calls on it to meet a wide range of we suggest the list of principles is amended to prioritise actions that meet multiple goals. To this end, we submit that suggested actions identify how they meet primary, secondary and other goals wherever possible. This is necessary to ensure our diverse needs can be met efficiently. Consequently, we suggest the following amendments:

In principle 3, 'Urban development should actively improve social, environmental and economic outcomes' we suggest an additional bullet point is added that states we must...

*enhance design standards to ensure interventions can serve multiple purposes safely and without conflict.*

In principle 4, Improving the evidence base will underpin urban innovation we fully agree in the importance of ensuring policy has firm foundations in evidence. We note that its absence or lack of confidence in the evidence we have is a constraint on policy development and action. We further note that evidence is most patchy in geographically remote and less well-resourced areas. To this end we suggest an additional point that states we should inform future changes and drive improvement and innovation, especially through

*Seeking to prioritise the evidence deserts that have hindered the development of effective policies*

In principle 5, Fair and inclusive development builds equitable communities. We strongly support the list that starts 'we must prioritise' and suggest this may be further strengthened by an additional bullet point that states: '*planning instruments and practice must ensure all sections of urban communities enjoy the invitations to be active and engage with others that come from a high standard of urban amenity.*

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